

St. Lawrence County  
**BOARD OF LEGISLATORS**  
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**RUTH A. DOYLE**  
County Administrator

**JOHN BURKE**  
Chair, Board of Legislators

December 19, 2016

Lya Theodoratos  
EPA Region 2  
290 Broadway; 18<sup>th</sup> Floor  
New York, NY 10007

**RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant**

Dear Ms. Theodoratos:

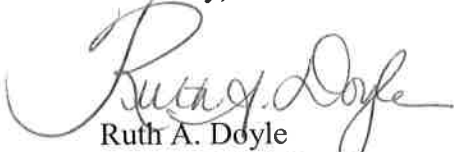
St. Lawrence County is pleased to submit this application to the U.S. EPA for financial assistance to conduct environmental cleanup activities at the former Jones & Laughlin Ore Company (J&L Steel) located in the Town of Clifton, St. Lawrence County, New York. Specifically, cleanup activities will focus on the abatement of ACM- and PCB-infused building materials found scattered throughout the site's numerous abandoned and deteriorating structures.

- a. Applicant Identification: St. Lawrence County (NY)  
48 Court Street  
Canton, NY 13617-1197
- b(i). Grant Type: Cleanup
- b(ii). Federal Funds Requested: \$200,000 (no waiver requested)
- b(iii). Contamination: Hazardous Substances
- c. Location: Town of Clifton, St. Lawrence County, New York
- d. Property information: Former Jones & Laughlin Ore Company (J&L Steel)  
4669 State Highway 3  
Star Lake, NY 13690  
Physical location: Town of Clifton  
EPA Identification Number: A23H

- e(i). Project Director: Keith Zimmerman  
St. Lawrence County Planning Office  
48 Court Street  
Canton, NY 13617  
Telephone: (315) 379-2292  
Fax: (315) 379-2252  
E-mail: [kzimmerman@stlawco.org](mailto:kzimmerman@stlawco.org)
- e(ii). Highest Ranking Elected Official: John Burke, Chair, Board of Legislators  
St. Lawrence County  
48 Court Street  
Canton, NY 13617  
Telephone: (315) 379-2276  
Fax: (315) 379-2463  
E-mail: [JBurke@stlawco.org](mailto:JBurke@stlawco.org)
- f(i). Population, St. Lawrence County: 112,015  
Population, Town of Clifton: 865  
(2010-2014 ACS 5-Year Estimates)
- f(ii). NA
- f(iii). Neither St. Lawrence County nor the Town of Clifton have experienced "Persistent Poverty" pursuant to the parameters laid out in the FY17 Guidelines for Brownfields Cleanup Grants. It should be noted, however, that the Town, the County and the entire region of northern New York have long struggled with low household incomes, a stagnant or declining tax base, and high unemployment.
- g. "Other Factors" Checklist is attached.
- h. Acknowledgment letter from the New York State Department of Environmental Conservation is attached.

St. Lawrence County respectfully requests that the U.S. EPA look favorably upon this request for financial assistance and welcomes any questions or concerns related to the proposed cleanup project and/or application materials.

Sincerely,



Ruth A. Doyle  
County Administrator

## **1. Community Need**

St. Lawrence County is located in northern New York State; it is nestled against the St. Lawrence River and the international border with Canada. It is large, rural, exceptionally remote, geographically diverse, and sparsely populated. Rich natural resources and access to the St. Lawrence River (and later, the St. Lawrence Seaway) brought settlers to this region, followed by industry, but with the decline of industry in the U.S., so too, went the economy of this area known as the “North Country.” The County has suffered a stagnant economy for years; unemployment and poverty rates are chronically high. Large, industrial employers historically offered well-paying employment: generations of families were once employed by the likes of J&L Steel, Benson Mines, General Motors, Reynolds Metals and Alcoa. Of these, only Alcoa remains.

The people of the North Country don’t ask for much, because they simply don’t expect much. The basics here are, arguably, more basic than in many other parts of the U.S. Things like cellular service, broadband and even 911 service are not givens. Those with significant health conditions must travel approximately 150 miles to regional health centers for specialized care; many travel further, to New York City and Boston. North Country people expect to travel: for work, for medical care, and even for groceries. Most local governments operate on thin budgets and have been forced to cut services to stay within the State-mandated property tax cap. Highway budgets are an easy target; as a result, bridge and highway work and replacement of critical equipment like snowplows (the southern part of St. Lawrence County is in Lake Ontario’s lake-effect snowbelt) are often delayed, potentially to the point of catastrophic failure.

### **1a. Target Community and Brownfields**

#### **Community and Target Area Descriptions**

Clifton and Fine are adjacent towns in the southern part of St. Lawrence County; they are both within the “Blue Line” of the Adirondack Park, a complex patchwork of public and private land that is the largest publicly protected area in the contiguous U.S. It contains large tracts of designated Wilderness, lesser-restricted Forest Preserve, and many Villages and hamlets. Many of these population centers grew around extractive industries, like mining and logging. The remnants of these industries, including brownfields, are particularly inconsistent with current trends that focus on tourism and quality of life as primary economic drivers.

The Towns of Clifton and Fine share most of the significant community resources in their 300+ square miles, including a school and a 20-bed designated Critical Access Hospital. This narrative will include both communities in some references, where it is most accurate and correct to do so. It is noted here that their attributes and challenges, as well as their population and demographics are reasonably consistent with one another. For statistical purposes in some cases, the narrative will specify the Town of Clifton, home of J&L Steel, the focus of this project’s scope of work.

The former Jones and Laughlin (J&L) Site (EPA Identification Number A23H) is an abandoned 54.7-acre iron ore processing facility located on State Highway 3 near the hamlet of Star Lake. State Highway 3 is the western gateway to the Adirondack Park and, in particular, the 107,230-acre Five Ponds Wilderness, which is known as one of the most remote of New York State’s Wilderness Areas due to its expansive geography and lack of access.

To reach this crown jewel of New York State Wilderness areas, one travels past J&L. The ore processing facility there was built in 1939 to process iron ore extracted from Benson Mines, once the largest open pit iron ore mine in the world. Together, they employed approximately 1,200 people at the peak of operations. Since its closure in 1977, the former J&L Steel site has served as a reminder of the Town's industrial past, and as a symbol of an economy that has never recovered from its loss. The site has 28 buildings/ancillary structures that have been exposed to the elements for 39 years. Many structures loom over State Highway 3, imposing a significant blighting effect on those who live near, or travel through, this gateway to the Adirondack Park.

J&L is an active oil spill site; it has been thoroughly assessed by the County, State and U.S. EPA. Both the NYS Department of Environmental Conservation (DEC) and the EPA have conducted remedial activities to address the oil spill; efforts are on-going. In addition to these subsurface issues, the deterioration of buildings throughout the site has exposed another concern: they are contaminated with asbestos-containing materials and some potentially PCB-infused window and door caulking materials. The principal aim of this application is to address those *above-ground* contaminants.

### **Demographic Information and Indicators of Need**

At 2,686 square miles, St. Lawrence County is one of the largest counties east of the Mississippi River, and is home to 112,015 people according to the 2010-2014 American Community Survey (ACS). The County includes 32 towns, 12 villages and one city, but the 2010 Census indicates that 37% of the County's residents live in five population centers: the City of Ogdensburg (11,128); and the villages of Massena (10,936), Potsdam (9,428), Canton (6,314) and Gouverneur (3,949). The communities of Gouverneur, Massena and Ogdensburg have historically served as industrial hubs (mining in and around Gouverneur, manufacturing in Massena, and distribution in Ogdensburg). St. Lawrence County's economy has languished for year and significant numbers of its population live below the poverty level. Data demonstrates that most socio-economic conditions are worse in the Town of Clifton, the target community.

Demographic Information: Population, Income and Poverty				
	T. Clifton	St. Law. Co.	NYS	U.S.
Population	865	112,015	19,594,330	314,107,084
% Minority	4.2%	6.7%	35%	26.2%
Median Household Income	\$43,269	\$44,454	\$58,687	\$53,482
% Households w/ SSI	11.6%	7.6%	6.3%	5.3%
% Households w/ Public Assistance	8.8%	3.5%	3.4%	2.8%
% Individuals Below Poverty	22.8%	19.7%	15.6%	15.6%
% Families Below Poverty w/ Children Under 18	34.5%	23.7%	18.5%	18.1%
% Unemployed	24.0%	10.8%	8.9%	9.2%

2010-2014 American Community Survey 5-Year Estimate (includes Census tract 4925)

Key observations include:

- More people in St. Lawrence County, by percentage, receive public assistance and/or food stamps than in NYS or the U.S.

- In the U.S. slightly more than 5% of the population depends on SSI payments; in the Town of Clifton, more than double that rate (11.6%) of residents depend on SSI payments.
- St. Lawrence County has 4.1% more and the Town of Clifton has 7.2% more individuals living below the poverty line than does the U.S. on average.
- Average annual unemployment in the County has ranged from 1.6-2.2% higher than NYS in the last five years, and has been higher than NYS since at least 1990. With the collapse of industry in the southern portion of the County, unemployment has been a significant and persistent problem, as evidenced by the 24% rate in the Town of Clifton.

### **Brownfields and Their Impacts**

St. Lawrence County has a range of known or suspected contaminated sites; many are old gas stations or auto shops, but it also has a number of large brownfields sites. It has four National Priority List (NPL) sites and three large RCRA sites, including J&L. The County is a primary stakeholder in the on-going remediation efforts at the former General Motors (GM) site in Massena, and is developing a revitalization plan for this Superfund site with assistance through the NYS Department of State Brownfield Opportunity Areas (BOA) Program. There are also several NYS DEC remediation projects, including: Waste Stream Inc. Site (Potsdam); Collins Property Site (Oswegatchie); Ogdensburg Former Manufactured Gas Plant Site (Ogdensburg); Former J&L Ore Processing (Clifton). (source: <http://www.dec.ny.gov/chemical/37560.html>)

Due to St. Lawrence County's geography, groundwater contamination resulting from brownfields poses the most likely real, and perceived, environmental impacts because the majority of households rely on private wells. The area's low population density makes it difficult, at best, to identify specific sources of contamination. Again, the low expectations of many residents play a factor: some County residents simply accept that they cannot consume their well water.

#### **1b. Welfare, Environmental, and Public Health Impacts**

As described in **Section 1a.**, the deteriorating structures of J&L loom over State Highway 3 and remain visible for nearly a mile. Not every passer-by knows the history of "those ugly blue buildings," but every resident or traveler upon this northwestern gateway to the Adirondack Park is impacted by the sight. To the residents of Clifton and Fine, they remain a constant reminder of the loss of J&L, the downward spiral of the local economy, and the out-migration of population, which is best demonstrated by enrollment history at the Clifton-Fine School: in 1970, there were approximately 1,200 students in grades K-12. Today, there are only 325. For itinerant travelers, it surely must raise questions about how such a thing could exist in the gateway of the great eastern wilderness.

As these structures deteriorate, the integrity of the asbestos and PCB-contaminated materials degrades, changing the nature of risks and the pathways for potential mobility and transport away from the site. In addition to the impoverished Hamlets of Star Lake and Newton Falls proximate to the site, several other key community facilities are located within a five mile radius of the site including: a K-12 public school; a senior citizen housing project and congregate dining site; a hospital; municipal water system intakes; a solid waste transfer station; and an institution

of higher learning. The unsecure access to the site makes it vulnerable to trespass and inappropriate use creating yet another potential pathway to exposure.

The Robert Wood Johnson Foundation (RWJF) annually releases health rankings, by County, for the nation. In 2016, the RWJF ranked St. Lawrence County 51 out of 62 counties in NYS for health outcomes, based on equal weighting of length and quality of life factors; and 58 of 62 for health factors (based upon performance in health behaviors, clinical care, social and economic factors, and physical environment). These ratings are substantiated by the following: males and females in St. Lawrence County have a lower life expectancy and more adults report poor physical health than adults in neighboring counties and throughout New York State. Babies born in St. Lawrence County have a higher incidence of low birth weight than neighboring counties.

Low population density makes it difficult to clearly link health outcomes to brownfields like J&L, but exposure to asbestos and PCB-containing materials may be a contributing factor in the high rate of pulmonary issues in St. Lawrence County. The Fort Drum Regional Health Planning Organization developed the *North Country Health Compass* to compile data for St. Lawrence, Lewis and Jefferson Counties in northern New York. The *Health Compass* shows that St. Lawrence County experiences higher rates than neighboring counties, NYS and the U.S. with respect to the incidence rate of lung/bronchus cancers; age-related deaths due to lung cancer; age-related deaths due to chronic lower respiratory diseases; and adults with asthma.

It should be noted here that although the rate of adults who smoke is comparatively higher in the County, this increase is not proportionate to the increased rates of pulmonary issues. For example, the rate of adults who smoke is 29% higher in the County than the State, but the death rate due to lung cancer (per 100,000 people) is 46% higher and the death rate due to chronic lower respiratory diseases is 96% higher.

It is, however, mental health concerns that weigh more heavily on residents of Clifton and Fine. For those aging in place or held hostage by their economic condition, the decay of structures at J&L is a constant reminder of the decay of their community. The Hamlet of Star Lake is nearest to J&L; within the Hamlet proper, Median Household and Family income are both at least 5% lower than the County average and approximately 70% of that of the State as a whole. The number of households relying on SSI payments is 25% greater than the County average. More telling, one in four households rely on SNAP program funds to address their household food needs, a rate 60% higher than the County average. The overall per capita income in the Hamlet is 12% lower than the County average.

Data from the *Health Compass* indicates that St. Lawrence County is among the highest of all counties in NYS for the percentage of adults with a high rate of “frequent mental distress,” (the percentage of adults who stated that their mental health, including stress, depression, and problems with emotions, was not good for 14 or more of the past 30 days). For the Clifton-Fine (C-F) Hospital service area, the numbers appear to substantiate what residents report anecdotally: a sense of hopelessness linked to economic distress.

- The C-F Hospital has a higher rate of ER admissions due to mental health than any other hospital in the tri-county region: 227.3 (per 10,000 people) while the region’s median rate is 135.2. Moreover, this rate has increased nearly 74% from the period 2008-2010 to the period 2010-2012.

- The rate of ER admissions due to adolescent suicide and intentional self-inflicted injury in the period 2010-2012 has increased more than 1½ times the rate in 2008-2010.
- The C-F Hospital also has a high hospitalization rate due to mental health: 147.5 (per 10,000 people) while the region's median rate is 130.2. This rate has increased nearly 94% from the period 2008-2010 to the period 2010-2012.

**1c. Financial Need**

***1c(i). Economic Conditions***

As described in **Section 1a.**, the County's population is sparse, its tax base is limited and its economy is stagnant. Local governments struggle to provide basic services. The loss of 900 well-paying industrial jobs has battered the region's economy in the last decade, losses include: Reynolds/Alcoa East; General Motors Powertrain; Newton Falls Fine Paper; St. Lawrence Zinc; Gouverneur Talc. As a percentage of the 28,004 residents of St. Lawrence County who worked full-time, year-round according to the 2011-2015 ACS, these 900 lost jobs represent over 3% of total employment in the County. The loss of an additional 600 jobs at Alcoa was delayed in late 2015 by a NYS incentive package, but local officials see the writing on the wall.

St. Lawrence County has been identified by the NYS Comptroller as a severely stressed local government in FY 2013 and 2014; the same is anticipated for FY 2015. This is principally due to 1) a diminished fund balance that threatens operational stability of the government; 2) low sales tax yields; and 3) a strong dollar that severely impacts Canadian cross-border trade and visitor traffic. The NYS incentive to stay below an inflationary tax cap further limits the ability of the County to aggressively pursue funding strategies to remedy structural weaknesses.

The County's bond rating with Standard and Poor's reflects the fact that external conditions limit the ability of the County to raise revenues locally. Its underlying rating on the County's general obligation debt was lowered in 2016, noting "diminished flexibility over the past three years to negative levels that we do not expect will significantly improve in the near term."

The County has enacted policies to rebuild its fund balance, but these policies will take time given the limitations of the tax cap. Policies include the elimination of positions as attrition allows, exacerbating staff capacity concerns resulting from the elimination of 150 positions over the last five years. In this economically restricted environment, community and economic developers are forced to look, almost exclusively, to Federal and State sources of funding for brownfields projects.

***1c(ii). Economic Effects of Brownfields***

Speaking broadly about the economic effects of brownfields, consider: key economic drivers for the County are agriculture, tourism, and sport fisheries. The State actively promotes two key tourism regions that converge in St. Lawrence County: the Thousand Islands and Adirondacks. According to the NYS Department of Labor, the tourism industry supported 1,000 jobs and contributed \$14.1 million in wages to the County's economy in 2011. The Towns of Clifton and Fine have extensive tracts of public land and large forest land holdings that are heavily used for outdoor recreation. The blighting effect of brownfields, especially J&L, poses a significant threat to the tourism industry; and the potential for surface- and groundwater contamination threatens all three of the area's key economic drivers.

Honing in on the target area, the location of J&L is significant: with rail service and road access along New York State Highway 3, it is part of 3,000+ contiguous acres of land in the Towns of Clifton and Fine currently classified for industrial use. Bookended by J&L and the former Newton Falls Fine Paper mill, the majority of this industrial classification is dominated by the forest and mineral resource holdings of Benson Mines. Land permissible for industrial use within the Adirondack Park comprises a scant 0.2% of its nearly 6,000,000 acres; each such area is extremely important to the working landscape premise of the Park's public-private amalgam. The unusable state of J&L inhibits its strategic position for economic development, resulting in lost economic opportunity.

## **2. Project Description and Feasibility of Success**

### **2a(i). Existing Conditions**

The J&L property is a 54.7-acre site with 28 buildings and ancillary structures. St. Lawrence County has determined that all of these buildings and structures should be removed to eliminate environmental, health and safety hazards and to enhance redevelopment potential of the property. The J&L Site is comprised of two distinct areas: 1) a 14.2-acre section has been determined by the NYS DEC to be reusable with no further remediation. This area is immediately adjacent to State Highway 3 and County Route 60; and 2) a 40.5 acre section containing all but one building, and is the location of a million-gallon oil spill and associated remediation efforts.

The site has been fully assessed; results are documented in several reports dating from the early 1990s to the most recent study that was completed in 2014. In 2004, NYS DEC utilized Environmental Restoration Program (ERP) funds to continue to assess and characterize the site. This project culminated with a Record of Decision allowing the 14.2 areas to be reused with no further remediation. The NYSDEC and the U.S. EPA are utilizing State and Federal Oil Spill Funds to continue to remediate the oil spill on the balance of the site.

In 2014, the EPA initiated a CERCLA action to remediate friable asbestos, mercury, PCBs and other hazardous materials from select buildings on the site. The EPA has stated that no further asbestos remediation will occur on the site and that this limited work under CERCLA was completed because it created an immediate health hazard to (EPA) contractors working on the site. J&L is listed as a potential Superfund site, but State and Federal agencies indicate that there are no plans to upgrade this status, qualifying for additional funding.

As the buildings continue to degrade, the remaining 141,852 square feet of asbestos-containing buildings materials; 3,000 linear feet of friable asbestos pipe insulation and 93 square feet of polychlorinated bi-phenyls (PCB) caulking and window glaze will continue to be dispersed throughout the site and locality, exposing site workers and the community to public health and environmental hazards.

### **2a(ii). Proposed Cleanup Plan**

This application proposes to undertake hazard removal and disposal of residual contaminants present on the J&L site – to allow for further demolition of deteriorated structures and to allow usable portions to be restored to shovel-ready condition.



The recommended cleanup alternative in the ABCA is hazardous material abatement from onsite structures with *offsite* disposal. With other local stakeholders, St. Lawrence has coordinated funding and initiated the first of two anticipated phases of abatement/demolition, which is anticipated to abate hazardous materials in 11 structures. The scope of work proposed herein is the abatement/demolition of 16 structures.

***2a(iii). Alignment with Revitalization Plans***

The proposed cleanup, and future redevelopment of J&L is consistent with relevant local and regional revitalization/economic development plans. The Clifton-Fine Local Waterfront Revitalization Plan (2007) specifically cites the redevelopment of J&L as a community priority. The St. Lawrence County Public Policy Guide (1995; updated 2011) seeks to guide decisions that determine the common destiny, and states that “Infill development and adaptive reuse should be promoted by municipalities to encourage the reuse of land and buildings.” The St. Lawrence County Comprehensive Economic Development Strategy (CEDS, 2013) includes a goal to “Develop a long-term reuse plan for ... brownfield locations in the County,” including J&L and Newton Falls Fine Paper.

With site control attained in 2014, there are no expected barriers, save costs, that adversely impact the ability of the County to engage in the proposed clean-up and remedial activities.

Industrially classified sites in the Adirondack Park are identified as a strength in a November 2014 report of the Adirondack Partnership, “Advantage Adirondacks: Advancing Economic Opportunities Across the Adirondack Park.” This report identifies a goal to reinvent traditional industry (forest products, natural resources and agriculture) by expanding sites for compatible development and redeveloping idled, vacant and underused properties. A specific associated action item is to “inventory and assess vacant, underutilized and idled properties (including potential brownfield sites) and pursue all available State and Federal resources to put the sites back into productive use.” This report represents a broad array of local and regional stakeholders and demonstrates the significance of the small handful of APA-classified industrial sites within a regional strategy for economic sustainability.

The proposed Brownfield cleanup project at the J&L site addresses several Equitable Development Outcomes, specifically including: “Reduce toxicity, illegal dumping, and blighted vacant parcels.” The project will also “Mitigate environmental conditions through effective deconstruction and remediation strategies which address solid and hazardous wastes, and improve air and water quality,” and will “Contribute to greener and healthier homes, buildings and neighborhoods.”

Redevelopment and productive re-use of the J&L site will capitalize on decades of time and monies invested in its assessment and remediation. State funds invested to date are measured in millions; County funds invested are measured in hundreds of thousands. Moreover, there could be no better location for potential industrial development in the Adirondack Park than this parcel, with its industrial history and transportation infrastructure.

The site is well-served by existing infrastructure: it has immediate access to State Highway 3 and County Route 6; has available 3-phase power; fiber optic lines run along State Highway 3 (despite lack of high-speed broadband service in many areas of the County); an existing rail line

is nearing completion of a \$10 million rehabilitation that will be completed in 2017. In addition, the Towns of Clifton and Fine have initiated a Regional Water System Improvement Project, with \$11 million from NYS. This project will consolidate three disparate water systems in the two towns, connect the Star Lake and Newton Falls water systems, and provide municipal water to the J&L site. Since significant oil contamination will likely preclude the future use of wells on this site, the provision of municipal water will remove a significant barrier to redevelopment.

## 2b. Task Descriptions and Budget Table

The \$240,000 EPA-project budget is a subset of a larger, \$1.6 million budget anticipated for Phase Two abatement/demolition. Historical assessments and a preliminary engineering phase informed the specifications for an RFP issued by the County in 2016. Cost estimates for Phase Two were obtained from this competitive bid process.

Budget Categories	Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	
Personnel				\$1,400	\$6,680*	\$8,080
Fringe						
Travel				\$1,200		\$1,200
Equipment						
Supplies				\$800		\$800
Contractual	\$198,000	\$11,900	\$17,800			\$227,700
Other - Legal					\$2,220	\$2,220
Total Federal Funding	\$173,650	\$5,950	\$8,900	\$2,600	\$8,900	\$200,000
Cost Share (20%)	\$24,350	\$5,950	\$8,900	\$800	\$0	\$40,000
Total Budget	\$198,000	\$11,900	\$17,900	\$3,400	\$8,900	\$240,000

\*This line item is rounded up slightly for the sake of clarity and due to hourly pro-ration of time; see Task 5 description below.

Task 1, Abatement/Demolition, \$198,000, is the majority of project costs. Total Phase 2 costs are based upon the County's 2016 RFP, which was specifically designed to facilitate a phased approach to abatement/demolition. Abatement/demolition costs are a contractual expense.

Task 2, Construction Management and Inspection, \$11,900, is pro-rated according to the Phase 1 costs as a percentage of abatement/demolition activities. This task will continue to be carried out by the Development Authority of the North Country, a key stakeholder in many regionally-significant projects.

Task 3, Asbestos Air Monitoring, \$17,800, is also pro-rated according to the Phase 1 costs as a percentage of abatement/demolition activities. Air monitoring costs are a contractual expense.

Task 4, Public Meetings, Community Involvement, Travel \$3,400. Costs include \$800 for newspaper advertising and presentation materials; personnel/fringe costs of \$1,400 for County staff to promote and attend up to four public meetings (20 hours at \$70/hour); and \$1,200 in travel expenses for one County Staff person to attend the 2017 National Brownfields Conference.

Task 5, Programmatic Management, Reporting, and Legal \$8,900\*, is based upon estimated hours of personnel/fringe costs for County staff for project management (including

communications with local, regional, State and Federal stakeholders) and requisite project reporting (95+ hours at \$70/hour); and legal expenses of \$2,220 (12 hours at \$185/hour; the County has utilized the expertise of an environmental attorney on all brownfields projects since 2009; the retainer rate of \$185/hour has not changed in that time). \*This line item is rounded up slightly for the sake of clarity and due to hourly pro-ration of time.

## **2c. Ability to Leverage**

The assessment, management and remediation of the J&L site have consumed several million dollars in local, County and State funds over the last three decades. Local stakeholders have maintained their commitment of time and capacity despite funding limitations, budget cuts and diminished staff capacity, and continue resolute about the site's potential to bring much-needed jobs and private investment to the region.

J&L is a *Priority Project* of the North Country Regional Economic Development Council (NCREDC), appointed by Governor Cuomo to reinvigorate economic development from the ground up. J&L has received three grants to assist with redevelopment of the site: 1) \$87,500 NYS grant leveraged with \$87,500 in local funds completed a Structural Engineering and Demolition Assessment Study; 2) a \$10 million grant leveraged with \$1 million in local funds is rehabilitating a 46-mile section of railroad that runs through J&L to the Village of Carthage where it intersects with regional rail lines; and 3) a Northern Border Regional Commission grant of \$234,155 to rehabilitate a railroad bridge crossing.

Stakeholders have an aggressive funding strategy to complete abatement/demolition activities of all remaining structures in Phase 2. Pursuant to this strategy, U.S. EPA funds will be leveraged with \$1.36 million over and above the required local share funds. Anticipated sources of leverage funds include: \$500,000 Restore NY Grant (application pending); \$280,000 NYS Empire State Development funds; \$250,000 Northern Border Regional Commission; \$300,000 National Grid Brownfield Redevelopment Program; and \$30,000 local funds. See Pages 29-30 of **Required Attachments** for additional detail and status of these funds. In coming years, there will be additional funds made available through New York Power Authority relicensing that will be purposed for marketing the key assets in the region.

## **3. Community Engagement and Partnerships**

### **3a. Engaging the Community**

J&L has been a priority for community stakeholders for nearly 30 years; in this time, the stakeholder group has been distilled to a group of entities best-positioned to bring about redevelopment. The appropriateness of this distillation is evidenced by the recent support for this project from the NCREDC and the Federal and State commitment to oil spill remediation.

These well-established partnerships will be maintained throughout the U.S. EPA Brownfield Cleanup project and will continue to be utilized to educate the community about project status and solicit input regarding site cleanup and redevelopment. Ongoing community engagement activities include: monthly conference calls with State, Local and regional partners, periodic project updates at public informational meetings and special events throughout the Adirondack Park; and use of social media and local news outlets to post updates on project status and public

meetings. For example, at the outset of Phase 1 abatement/demolition work, a press event was held at the gates of the site to commemorate the significance of the first building coming down.

For the purpose of this proposal, community input was solicited by noticing (by legal notice published December 1, 2016) and advertising a public hearing in Newton Falls, proximate to J&L. The draft narrative and ABCA were also available for review and comment at the St. Lawrence County Planning Office.

Within the proposed EPA project scope, up to four community meetings may be held for the purposes of: 1) informing the community about project status; 2) soliciting public input regarding cleanup-related activities; and 3) soliciting public input regarding potential redevelopment options. Key stakeholders will continue monthly “technical” conference calls with NYS DEC and the EPA; monthly redevelopment stakeholder meetings; and efforts to develop a re-use framework for the site.

Community outreach will be organized by the St. Lawrence County Planning Office, under advisement and with the assistance of the Clifton Fine Economic Development Corporation (CFEDC) Accessibility accommodations and translation services will be made available for public meetings, as needed. See **Section 3c.** for more information on the appropriateness of the CFEDC as a vehicle for community outreach. The Town of Fine municipal office in Star Lake will be utilized, as needed, as a project repository (see **Section 3b.**).

### ***3b. Partnerships with Government Agencies***

Remediation and redevelopment of J&L are tasks of considerable size and scope. The roles of each of the key stakeholders are outlined below; letters of commitment are included as part of the **Required Attachments.**

St. Lawrence County: the County owns the site and is in contractual relationships for asbestos abatement, demolition and removal and required asbestos air monitoring. The ongoing commitment of time and limited staff capacity is a significant contribution to redevelopment efforts. See **Section 5b.** for more detail on County staff resources other capabilities.

St. Lawrence County Economic Development Agency (SLCIDA): a public benefit corporation, the SLCIDA provides financial capacity for cash-flow considerations of the project. The SLCIDA was awarded the \$87,500 in ESD funds being applied to Phase 1, as well as nearly \$10 million to improve the Newton Falls to Carthage rail line. The SLCIDA facilitated the commitment of St. Lawrence River Valley Redevelopment Agency funds toward the local match for Phase 1 costs. The SLCIDA is the lead entity responsible for the marketing of this and other industrial sites throughout the County.

Development Authority of the North Country (DANC): a public authority, DANC provides critical professional and technical resources for project engineering needs, construction management and inspection. DANC provided a \$250,000 redevelopment grant for Phase 1 and was the primary author of the National Grid grant for \$147,000. DANC’s mission is to serve the common interests of Jefferson, Lewis and St. Lawrence Counties by providing technical services and infrastructure to enhance economic opportunities and promote the health and well-being of the region’s communities.

Town of Clifton: The Town has and continues to provide financial resources and local support for redevelopment efforts. The Town applied \$10,000 cash and a \$50,000 State Aid to Municipalities grant to Phase 1. The Town has committed participation in redevelopment activities, the provision of public meeting space and assistance with community outreach.

Town of Fine: Like Clifton, the Town of Fine has and continues to provide financial resources and critical local support for redevelopment efforts. The Town's municipal offices in Star Lake are proximate to J&L; the Town has committed the use and availability of meeting and office space, telephones (cellular coverage is locally unreliable), modest staff support, public outreach via the Town website and office equipment as needed for public meetings and work sessions.

Adirondack Park Agency (APA): The APA has jurisdiction over development and land use matters in the Adirondack Park. The APA participates as a stakeholder in redevelopment efforts. The APA issued a Jurisdictional Determination for this project on 9/28/16, indicating that the proposed project is consistent with current land use regulations and no permits are required.

The NYS Department of Environmental Conservation (DEC) and the U.S. EPA are both actively engaged in remediation activities at the site. The DEC coordinates a monthly conference call for all stakeholders to share information on remediation and redevelopment efforts.

### **3c. Partnerships with Community Organizations**

As described in **Section 1a.**, the interests and resources of the Towns of Clifton and Fine are interwoven. While there are a number of local interest groups, the majority are organized as committees; the Clifton-Fine Economic Development Corporation (CFEDC), a 501(c)(3) Not-for-Profit organization established in 1997, provides a framework for their existence and activities (<http://www.cliftonfineadk.com/development>). The human capital of these local organizations comes from a small pool of dedicated citizens. The CFEDC is the common thread; as such, it is appropriate that it is the community-based organization that best represents the interests of the Towns. The CFEDC is both an ear-to-the-ground and a voice for the community. It has long worked to coordinate local strategic planning and economic revitalization initiatives, and educate the public, and provided \$10,000 toward the local cash match for Phase 1 demolition. See the CFEDC's commitment letter in the **Required Attachments**.

### **3d. Partnerships with Workforce Development Programs**

The County has an ongoing relationship with the SLCIDA, the Workforce Investment Board, the Workforce Development Institute and other local job creation/job training/job development agencies. These relationships stand ready to assist as a specific re-use strategy emerges from ongoing redevelopment efforts.

## **4. Project Benefits**

### **4a. Welfare, Environmental and Public Health Benefits**

Abatement of asbestos and PCB-containing materials at J&L will eliminate these materials from the list of causal factors leading to the significantly high rate of pulmonary issues in St. Lawrence County. Demolition and removal of the decaying structures will eliminate an eyesore that has haunted the community and contributed to a sense of hopelessness for decades and likely to the high local incidence of mental health issues described in **Section 1b**.

#### **4b. Economic and Community Benefits**

Demolition and removal of the decaying structures will eliminate the blighting effect that has plagued this otherwise picturesque community and limited its economic development potential. With the buildings gone, J&L is well-suited for redevelopment. It is proximate to forest and mineral resources and is one of only 17 major industrially-classified parcels in the Adirondack Park, with only a handful not in current use.

A specific end-use has not yet been identified, but is possible to project potential scenarios and compare the potential for job creation and the generation of tax revenue. This 54-acre site could accommodate a single, large use or multiple smaller uses. Given the significant investment in rehabilitation of the rail line, a rail-based use must be considered. A rail park here might include structures that total approximately 200,000 square feet (SF). Based on a standard of 1,000 SF/job, this could accommodate 200 jobs. Jobs in this sector would likely be considered mid-range in terms of salary/wages. A technology-based use might include structures that total approximately 300,000 SF. Based on a standard of 525 SF/job, this might accommodate 500+ jobs. Jobs in this sector would likely be considered mid-high in terms of salary/wages.

Direct impact on the local tax base is difficult to extrapolate, since value per square foot varies significantly based on the type of structure and its location. A realistic value to project on unheated warehouse facilities in northern New York might be \$4 per SF; heated office space might be closer to \$25 per SF. While projections are difficult, it is safe to say that any productive re-use of this site will increase its tax assessed value from the current \$26,500.

#### **5. Programmatic Capability and Past Performance**

**5a. Audit Findings:** There have been no adverse audit findings from grant-related issues.

#### **5b. Programmatic Capability**

St. Lawrence County operates on a \$233 million budget, of which State and Federal funding and/or program assistance are a significant portion. The County conducts its accounting pursuant to the NYS Comptroller's guidance and completes both comprehensive- and single-purpose audits annually. The County is familiar with, and is confident of its ability to comply with, Federal funding submissions requirements, audit and control procedures, procurement policies, performance deadlines and periodic, as well as close-out reporting requirements.

For this project, the project management team is comprised primarily of staff of the County Planning Office, with tenures spanning from nine to 28 years. Planning Staff work closely with the County Attorney, the Treasurer's Office and the Real Property Office, and has worked closely with an environmental attorney on brownfields matters since 2009. DANC will provide additional capacity, as needed, in the areas of project management and grant administration; DANC staff includes licensed professional engineers, a certified safety professional, and experienced grant administrators. The project team will also be supplemented by the technical and legal expertise of the NYS DEC, the APA, and U.S. EPA. Key project staff will include:

Carrie Tuttle, PhD, PE, CSP – Director of Engineering for DANC, Dr. Tuttle is responsible for Project Management on behalf of the County and Project Team and oversees all aspects of the project, with support from Authority project engineers and the Project Team mentioned above.

Dr. Tuttle has over 20 years of professional experience working on environmental remediation, environmental engineering, and redevelopment projects and oversees a staff of nine professionals that work on inter-governmental projects.

Michelle Capone – Director of Regional Development for DANC, Ms. Capone is responsible for maintaining the demolition budget. She will also work with the County to ensure all grant documentation is completed in a timely fashion. Ms. Capone has been with the Development Authority for over 17 years, with experience in financial underwriting and budget management.

Keith Zimmerman – Director of the St. Lawrence County Planning Office. He has 28 years of experience with the County Planning Office and has, for the past 15, served as the Director. The office has been involved with remedial efforts at all of the EPA designated sites in the County, has administered multiple brownfield assessment and/or remediation grants and has delivered more than \$34 million in direct State and/or Federal funding for a broad array of community development needs. The County has a staff of over 800 people and can draw upon other expertise as needed. He oversees the County's participation in the project.

#### **5c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

**Outputs:** Most fundamentally, EPA funds will help the County continue demolition and a disposal of these ACM contaminated structures. As a measurable outcome, the volume of the 41 structures scheduled for demolition, removal and/or disposal is difficult to accurately calculate, but is well in excess of 500,000 cubic feet and an estimated 12,000 tons of materials. Project managers will track progress and report on these metric throughout the project.

The elimination of blight will be measured and documented by a series of photographs from specific vantage points. Similarly, there is evidence of succession plant life emerging through the macadam on the site; seasonal photographs will document the natural reclamation of the site by vegetation. Such natural succession will complement the efforts of the EPA to allow for *in situ* remediation of the remaining oil spill.

The County will hold up to four community meetings; and participate in monthly technical conference calls and redevelopment stakeholder meetings throughout the term of the project. Based upon the anticipated one-year active life of this project, this will yield (12) technical calls and (12) redevelopment meetings.

Last, the County will undertake a survey of community perception of optimism related to the demolition of this long-term blighting influence in the Clifton-Fine area. From a cultural perspective, this activity has been long anticipated and the County expects that, generally speaking, the malaise that has gripped this community for so long will be partially abated by this action. The County also intends to measure community response to the activities at the site in a series of community forums designed to inform prospective reuse of the site.

**Outcomes:** As described herein, the participatory engagement goes far beyond the Towns of Clifton and Fine. The financial partnership for the first phase reflects the commitment to the immediate goal of obtaining demolition and restoration of the site, but also to its long-term redevelopment potential.

From a community psychology perspective and regarding attitudes of residents and those visiting or passing through the area, the elimination of this long-term blight and visual reminder of economic and community distress will positively impact drivers and passengers of the 429,000+ annual motor vehicle trips on this stretch of State Highway 3, according to NYS DOT estimates.

As the site is leveled, cleared and prepared for reuse, the increase in reclaimed/available acreage is a measurable outcome. Likewise, expenditures for marketing the site for reuse will be measurable outcomes as will any future site investment and/or reported employment.

The removal and disposal of ACM contaminated waste will enhance the environmental condition of the site; the total tonnage of such waste will also be a documented outcome.

**5d. Past Performance and Accomplishments**

**5d(i).** *Not Applicable*

**5d(ii). Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements**

St. Lawrence County has never received Federal brownfields funds, but does have a well-established record of performance with respect to other federally-funded activities and initiatives including, for FY 2015 as reported expenditures included in the draft Schedule of Expenditures of Federal Awards (SEFA), \$ 31.8 million broken down by program as follows:

Agency	CFDA Number(s)	Expenditure
Department of Agriculture	10.561	\$1,615,258
Dept. of Housing & Urban Development	14.228	\$1,127,206
Department of Labor	17.258, 17.259, 17.278	\$903,578
Department of Transportation	20.509	\$2,054,108
Department of Education	84.181	\$42,153
Dept. of Health & Human Services	93.043, 93.052, 93.071, 17.235, 94.044, 93.045, 94.045, 93.053, 93.779, 93.069, 93.268, 93.563 93.645, 93.568, 93.658, 93.667 93.674, 93.994, 93.778, 93.959 93.558	\$25,592,037
Department of Homeland Security	97.067, 97.042, 97.039, 97.024	\$503,033
Total SEFA Federal Expenditures, FY2015		\$31,837,373

The County Planning Office, which will administer the grant on behalf of the County, has a long history of performance with funding from the U.S. Department of Housing and Urban Development and has successfully administered more than 50 CDBG and/or HOME program grants totaling more than \$34.6 million in all eligible categories of assistance (housing rehabilitation, home ownership assistance, imminent threat, public facilities and infrastructure and economic development), and assisting more than 1,100 income eligible households over the past 30 years.



Performance metrics include: number of households assisted with purchasing a home; number of households assisted with repair of substandard housing; number of substandard rental units brought into a standard condition subject to an affordable rental rate agreement; ability of assisted units to remain viable during the housing lending crisis (due to education component and refusal to subordinate to sub-prime lenders); number of subordinations and purposes; number of client financial defaults, number of LMI income eligible jobs created and/or retained with federal assistance; number of community facilities built or enhanced with Federal funding assistance; and overseeing the activities of sub-recipients as required, etc.

The County Planning Office routinely performs all required paperwork related to draws, semi-annual performance reports, sub-recipient monitoring, additional HUD performance reporting, etc. All projects have been delivered essentially on-time (in 2003, one project needed a one month extension to process the final draw after inspection of work completed) and with no significant program audit findings. This other public and private dollars leveraged exceeds the HUD-direct investment by at least a 2 to 1 ratio.

The County's performance with all Federal assistance it reports is spread among eight different departments of County government not including audit and accounting functions provided by the Treasurer's Office.

The County has received New York State funding assistance within this programmatic area for the FE/IS for an oil spill/contaminated industrial site in the Town of Clifton, NY; for an interim remediation measure at a site known as "Willow Island" in the Village of Canton; and the County also undertook a modest interim remedial measure (prior to the EPA designation and remediation) at a site known as "Sealand" in the Town of Lisbon, NY. All projects have been completed. Additionally, the County has substantively completed a revitalization plan for the former General Motors site in Massena, NY with funding assistance of the NYS Department of State Brownfield Opportunity Areas (BOA) program. All reporting requirements have been met and are up-to-date; project completion and close-out is expected in 2017.

**5d(iii).** *Not applicable*

### Appendix 3 Cleanup Other Factors Checklist

Name of Applicant: St. Lawrence County, New York

Please identify (with an **x**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	NA
Community population is 10,000 or less.	P. 2, Narrative
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
Target brownfield sites are impacted by mine-scarred land.	NA
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	P. 9, Narrative Pp. 29-30 Attachments
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	P. 5, Narrative
Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.	NA
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b>	NA
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	NA

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Bureau of Program Management  
625 Broadway, 12th Floor, Albany, NY 12233-7012  
P: (518) 402-9764 | F: (518) 402-9722  
www.dec.ny.gov

Ms. Ruth Doyle  
County Administrator  
St. Lawrence County  
48 Court Street  
Canton, NY 13676

DEC 05 2016

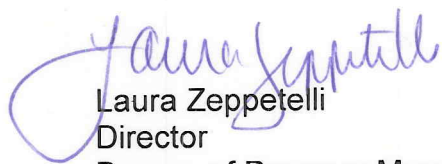
Dear Ms. Doyle:

This is to acknowledge that the New York State Department of Environmental Conservation (Department) received your request dated November 22, 2016, for a state acknowledgement letter for United States Environmental Protection Agency (USEPA) Brownfield grants.

I understand that the County plans to submit a Brownfield Cleanup Grant proposal in the amount of \$200,000 to continue remediation efforts at the former Jones & Laughlin Steel site in the Town of Clifton.

The Department encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,



Laura Zeppetelli  
Director  
Bureau of Program Management

ec: T. Wesley, USEPA Region 2  
G. Heitzman/G. McCullough, NYSDEC



Department of  
Environmental  
Conservation

## **REQUIRED ATTACHMENTS**

### **Eligibility Information and Threshold Criteria**

Response to Section III.B. of the FY17 Guidelines for  
Brownfields Cleanup Grants.....Pages 2-7

**Brownfields Property Approval Form.....Pages 8-10**

### **Property Approval Form Attachment**

Site Locator Map.....Page 11

**Draft Analysis of Brownfields Cleanup Alternatives (ABCA) .....Pages 12-19**

**Documentation of Community Notification .....Pages 20-28**

**Documentation indicating committed leveraged resources .....Pages 29-30**

**Letters of commitment from community organizations  
and key stakeholders.....Pages 31-38**

### **III.B. Threshold Criteria for Cleanup Grants**

**1. Applicant Eligibility**

The applicant, St. Lawrence County, is a “General Purpose Unit of Local Government” pursuant to 2 CFR 200.64.

**2. Site Ownership**

St. Lawrence County is the sole owner of this site, which was acquired via tax foreclosure on April 4, 2014.

**3. Basic Site Information**

(a) Name: Former Jones and Laughlin Ore Company (J&L Steel)

(b) Site location: 4669 State Highway 3, Star Lake, NY 13690 (Town of Clifton, NY)

(c) Current Owner: St. Lawrence County

**4. Status and History of Contamination**

(a) While the site is both a petroleum and hazardous substance site, this request for funding assistance will solely be applied toward the remediation/abatement of hazardous substances.

(b) *Operational history and current uses(s):* The Site is currently vacant. Jones and Laughlin Ore Company (J&L Steel) operated this site as a large ore separation and smelting site processing magnetite ore from 1939 to 1977.

(c) *Environmental concerns:* The Site includes surficial and sub-surface petroleum and minor PCB contamination, along with ACM and PCB-infused building materials that are found scattered throughout many of the deteriorating structures.

(d) *Genesis, nature and extent of contamination:* The petroleum contamination is presumed to represent years of accidental (and incidental) fuel oil leakage. The balance of contamination is related to the construction materials used in the buildings (many of which were considered best management practices at the time) including: asbestos (friable and non-friable); PCBs, mercury and lead.

The County, acting through the State's Environmental Restoration Program, investigated an (approximately) 14-acre portion of the Site, and determined that with the imposition of certain institutional controls (e.g., no use of on-site groundwater) through an Environmental Easement, a portion of the site is potentially available for commercial and industrial redevelopment. The County has secured a release of environmental liability for that portion.

The balance of acreage (approximately 40 acres) remains contaminated principally by an underground oil spill suspended on the top of the groundwater table. Partial salvaging of the site structures (legal and otherwise) and 40 years of natural deterioration in a harsh northern climate have decayed building structures and compromised materials in the buildings, elevating the risk of other contaminants (e.g. friable asbestos) being released to the environment with the potential to have adverse impacts on surrounding populations.

**5. Brownfields Site Definition**

The applicant affirms that this Site is a) not listed or proposed to be listed on the National Priorities List (NPL); b) is not subject to any unilateral administrative order, court orders, administrative orders on consent or judicial consent decrees issued to or entered into by parties under CERCLA; and c) is not subject to the jurisdiction, custody or control of the U.S. government.

**6. Environmental Assessment Required for Cleanup Proposals**

Site assessments and results are documented in several historical reports dating from 1989 to 2014. Specifically, these include:

- Preliminary subsurface investigation (Atlantic Testing Laboratories, 1989)
- Asbestos/demolition survey (Jack Eisenbach Engineering, PC, 1994)
- Phase I/Phase II Assessment (CDM, 1994)
- Site investigation (CDM, 2009).
- Preliminary Site Characterization Report for the Former J&L Steel Site (Parsons, October 2014).
- Final Site Characterization Report for the Former J&L Steel Site (Parsons, August 2016).

**7. Enforcement or Other Actions**

The County is unaware of any ongoing or anticipated environmental enforcement or other actions related to property. The County is unaware of any inquiries, or orders from Federal, State, or local government entities regarding the responsibility of any party (including the County) for the contamination, or hazardous substances at the site, including any liens. Upon information and belief, in the mid to late 1990s, the State of New York pursued Jones & Laughlin Steel Company's successor, LTV Steel, in a

bankruptcy proceeding for recovery of costs incurred by the State's Oil Spill Fund for cleaning up petroleum at the property and obtained payment of more than \$1 million. Also, the County has negotiated a Windfall Lien Memorandum of Understanding with EPA with respect to removal costs incurred by EPA at the property in 2014-15.

**8. Sites Requiring Property Specific Determination**

Not applicable; the site is not consistent with any of the special classes of property as described in Appendix 1, Section 1.5. The County is unaware of any planned or ongoing CERCLA-funded removal actions.

**9. Site Eligibility and Property Ownership Eligibility**

This Site is both a petroleum and hazardous substance site. This request for funding assistance will solely be applied toward the remediation/abatement of hazardous substances; accordingly, the County respectfully responds to items under (a), pursuant to Page 14 of the FY17 Guidelines for Brownfields Cleanup Grants.

**9a(1). CERCLA §107 Liability.** St. Lawrence County is not potentially liable for contamination at this site under CERCLA §107 as the County is a local government entity that acquired the property involuntarily in April 2014 from Dongrove Holdings, Inc. through in-rem tax foreclosure. In addition, the County had previously involuntarily acquired ownership through in-rem tax foreclosure from Exore Corp. in June 1989 and held title for approximately one year until it transferred title to Dongrove Holdings, Inc. in August 1990.

**9a(2). Information on Liability and Defense/Protections.**

- a) Information on Property Acquisition: St. Lawrence County, sole owner of the site, involuntarily acquired ownership in April 2014 from Dongrove Holdings, Inc. through in-Rem tax foreclosure. In addition, the County had previously involuntarily acquired ownership through In-Rem tax foreclosure from Exore Corp. in June 1989 and held title for approximately one year until it transferred title to Dongrove Holdings, Inc. in August 1990. The County has had no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or other potentially responsible parties) of the property, including Exore Corp. and Dongrove Holdings Inc.
- b) Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances and petroleum took place before the County involuntarily acquired the property in 1989 and in 2014. The County did not cause or contribute to any release of hazardous substances at the property or transport hazardous substances to the property.
- c) Pre-Purchase Inquiry: Prior to taking title through In-Rem foreclosure in 2014, the County did not undertake any Phase I site assessment. However, in the mid-2000s, the County conducted a Phase II investigation of the property under the Environmental Restoration Program administered by the New York State Department of Environmental Conservation (NYSDEC). See also **Section 6, Environmental Assessment Required for Cleanup Proposals.**

- d) Post Acquisition Uses: There has been no use of the property after the County took title in April 2014. The NYS DEC and EPA have conducted investigative and remedial activities at the property since that time, including removal actions by the EPA. No entities used the property after the County acquired title through in-rem foreclosure in June 1989 until title was transferred in August 1990.
- e) Continuing Obligations: Since acquiring title involuntarily in 2014, the County has assisted the EPA in its hazardous substance and petroleum removal efforts which are designed to stop any continuing release, prevent threatened future releases and prevent or limit exposure to petroleum and hazardous substances. In the future, the County will continue to comply with all land-use restrictions and institutional controls, assist and cooperate with EPA and others performing the cleanup, provide access to the property and comply with all information requests and administrative subpoenas and provide all legally required notices.

#### 10. Cleanup Authority and Oversight Structure

The site work performed to date has been overseen by the NYSDEC and the EPA; cleanup outlined as the scope of work proposed in the application to FY2017 U.S. EPA Brownfields Cleanup Grant Program will continue to be overseen in the same manner. Additionally, cleanup activities will be overseen by a licensed engineer with expertise in environmental remediation.

#### 11. Statutory Cost Share

- 11(a). The required 20 percent cost share (\$40,000) will be available through a combination of sources, a model the County used successfully to initiate Phase One of abatement/demolition activities in November 2016. Phase One has a total cost of \$588,000, with the following sources:

J&L Abatement/Demolition – Phase One		
Amount	Source	
\$250,000	Development Authority of the North Country Redevelopment Grant	
\$87,500	NYS Empire State Development Grant	
\$50,000	State and Municipal Facilities Program (SAM) Grant (Dormitory Authority of the State of New York), awarded to the Town of Clifton for clean-up activities at J&L; committed to Phase One by Town Resolution No. 34-2015 dated November 11, 2015.	
\$147,000	National Grid Brownfield Redevelopment Program	
\$53,500	Local Share	St. Lawrence River Valley Redevelopment Agency: \$18,000
		St. Lawrence County: \$15,500
		Town of Clifton: \$10,000
		Clifton-Fine Economic Development Corporation: \$10,000
<b>\$588,000</b>	<b>Total - Phase One</b>	



The proposed scope of work is a second phase of abatement/demolition activities. Phase Two carries a total cost of \$1.6 million; the County and local stakeholders anticipate the following sources of funds are necessary and attainable to fully fund Phase Two and complete abatement/demolition activities at the J&L site:

<b>J&amp;L Abatement/Demolition – Phase Two</b>		
<b>Amount</b>	<b>Source</b>	<b>Status</b>
\$500,000	Restore NY Grant (NYS Empire State Development)	Pending; application submitted September 2016
\$200,000	U.S. EPA	Current application to FY 2017 Program
\$280,000	NYS Empire State Development*	Anticipated application under the 2017 Consolidated Funding Application (CFA)
\$250,000	Northern Border Regional Commission	Anticipated application in Federal Fiscal Year 2017
\$300,000	National Grid Brownfield Redevelopment Program*	Anticipated 2017 application
\$70,000	Local funds	Local stakeholders anticipate raising a maximum of \$70,000 from local sources, as demonstrated in Phase One.
<b>\$1,600,000 Total - Phase Two</b>		

\*These two programs require other sources to become available as anticipated to be available in the respective amounts shown. Empire State Development funds through this program may account for only 20% of the total eligible costs, while National Grid has a maximum amount of \$300,000 that must be 25% or less of total eligible costs.

It should also be noted that the abatement/demolition activities proposed in this application are integrally related to a broader scope of redevelopment activities at the J&L site. The J&L Redevelopment project has been designated a Priority Project of the North Country Regional Economic Development Council, appointed by Governor Andrew Cuomo in 2011, as a means to re-structure community and economic development in the State of New York by facilitating a “bottom-up” approach. A rail project connecting to J&L received \$10 million in NYS Empire State Development funds leveraged by an additional \$1 million local share, as well as \$234,155 in Federal funds from the Northern Border Regional Commission.

**11(b).** Not applicable; a hardship waiver of cost share is not requested.

## **12. Community Notification**

A public meeting was noticed and held pursuant to FY17 Guidelines. A legal notice was published in the Watertown Daily Times, the area's only daily newspaper, on December 1, 2016; a press release was issued that same day. Both the legal notice and press release provided information on the date, time and location for a public meeting and indicated that a hard copy of the draft grant application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) would be available for public review and comment in the St. Lawrence County Planning Office, Room S13, 2<sup>nd</sup> Floor of the Public Safety Complex, 48 Court Street, Canton, New York, 13617, beginning December 5, 2016 and through the time of the public meeting at 6:30pm on December 14, 2016. No written comments were received.

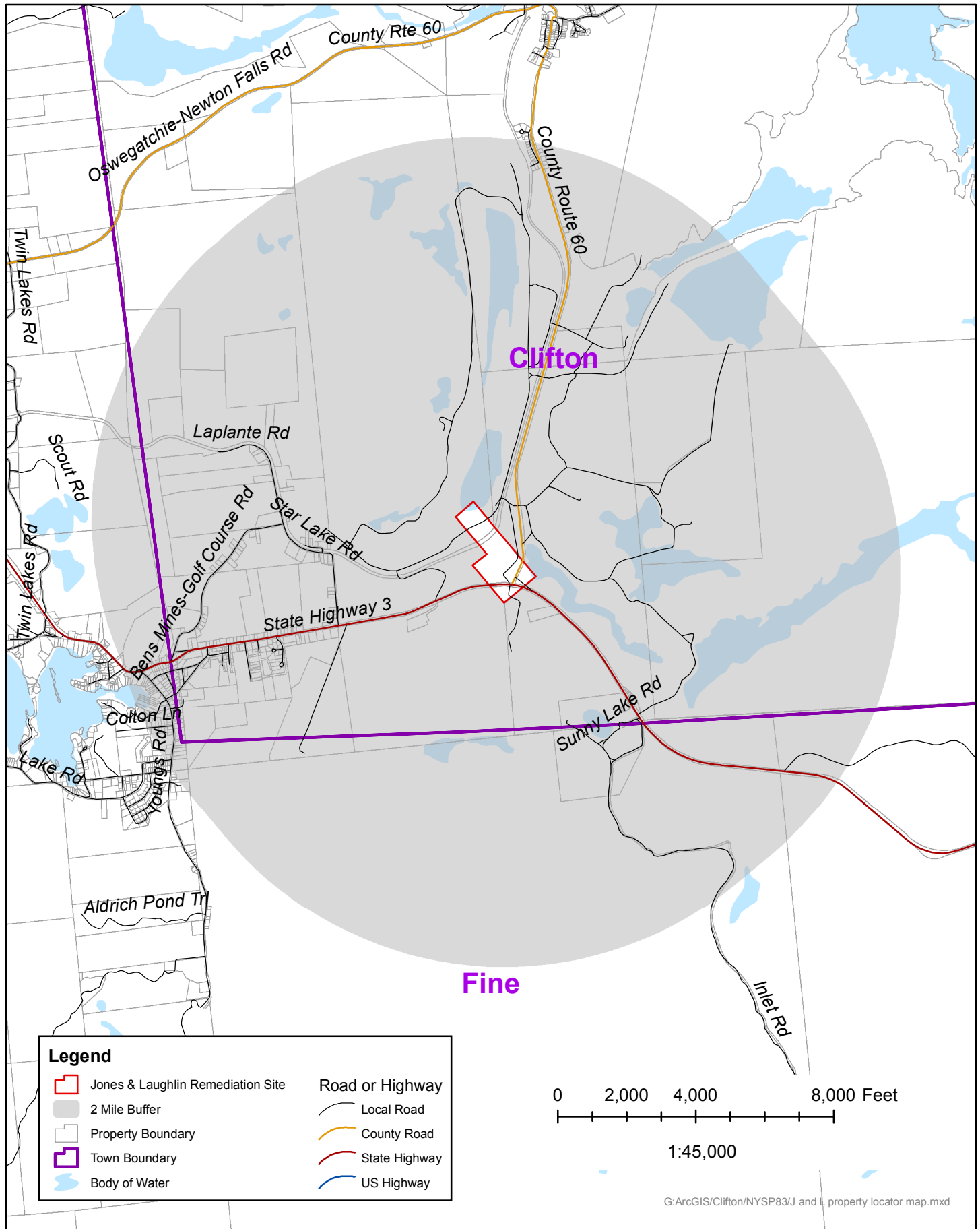
Nine members of the public attended the public meeting on December 14, 2016. Charles Hooven, Supervisor of the Town of Clifton, opened the hearing at 6:30pm. There were no questions and no substantive comments on the ABCA, the draft application, or the funding program/application process. A copy of the legal notice; Affidavit of Publication; press release; local news articles about the meeting/project; meeting materials; sign-in sheet and meeting summary are attached.

St. Lawrence County - Keith Zimmerman Phone Number: 315-379-2292 Email: kzimmerman@stlawco.org	<b>Brownfields Property Approval</b> EPA Region 2 290 Broadway, 18th FL, New York, NY 10007	<b>HAZARDOUS SUBSTANCES CONTAMINATION</b>
<b>I - Property Information</b>		
Name of Property: Former Jones and Laughling Ore Company (J & L Steel, CERCLA site)		
Address: 4669 State Route 3		
Zip Code: 13690	City: Town of Clifton, NY	
Current Owner: St. Lawrence County		
<b>II - Status and History of Contamination</b>		
Type of Contamination (mark one) : Hazardous Substances: <input checked="" type="checkbox"/> X_____ Petroleum: _____		
If contamination is co-mingle (hazardous substances and petroleum) please mark hazardous substances.		
Current Use of Property: vacant and abandoned	Period of operation: 1939 - 1977	Total Years of Operation: 38
Describe Environmental Concerns (if known): there is both surficial and sub-surface petroleum contamination on the site as well as ACM and PCB-infused building materials found scattered throughout many of the abandoned, deteriorating structures. These grant funds would be utilized to further abate the ACM and contaminated building materials before addition deterioration of the structures occurs, exacerbating the potential for additional environmental release and contamination		
How the property became contaminated? (if known): The site operating as a large ore separation and smelting site for many year processing magnetite ore. The petroleum contamination is presumed to represent years of accidental (and incidental) fuel oil leakage. The balance of contamination is related to the construction materials used in the buildings, many of which were considered best management practices at the time including: asbestos (friable and non-friable); PCBs, mercury and lead.		
Describe the nature and extent of contamination (to the extent possible): Prior actions by the State, acting through the County under a temporary incident of ownership remediated an 18+ acre of the site and it is potential available for redevelopment and the County has secured a release of environmental liability for that component part of the site. The balance of acreage remains contaminated principally by an underground oil spill suspended on the top of the ground-water table proximate to the site. Partial salvaging of the site (legal and otherwise) and 40 years of natural deterioration have decayed building structures and compromised materials in the buildings such that there is an elevated risk of other contaminants being released to the environment over time with further deterioration.		
<b>III - Property Eligibility for Funding</b>		
Is the property listed or proposed to be listed on the National Priority List? YES _____ NO _____ The County is not sure ... however, EPA is on the site conducting cleanup, in part, with CERCLA funds		
Is the property subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA YES _____ NO <input checked="" type="checkbox"/> X_____		
Is the property subject to the jurisdiction, custody, or control of the U.S. government? YES _____ NO <input checked="" type="checkbox"/> X_____		
<b>IV - Property Ownership Eligibility</b>		
<b>IV. 1 - CERCLA § 107 Liability</b>		
Are you eligible for one of the following CERCLA liability protections or defenses: (1) an innocent landowner; (2) a bona fide prospective purchaser (BFPP), (3) a contiguous property owner; or (4) a local or state government entity that acquired the property involuntarily through bankruptcy, tax delinquency, or abandonment, or by exercising its power of eminent domain.		
YES <input checked="" type="checkbox"/> Y _____ NO _____		
If the answer is YES, please explain why? The County acquired the subject property through tax foreclosure on 04-09-2014		
<b>IV. 2 - Enforcement Actions</b>		
The information provided in this section will be verified. EPA Region 2 will conduct an independent review of information related to the organization's responsibility for the contamination at the property.		
Identify known ongoing or anticipated environmental enforcement actions related to the property. NONE known at this time. St. Lawrence County, and both New York State and the Federal governments have been participants in the cleanup efforts at the site. Currently, the EPA has assumed responsibility for the ongoing clean-up efforts.		
Describe any inquiries or orders from federal, state, or local government entities that you organization is aware of regarding the responsibility of any party (including your organization) for the contamination at the property. Again, none known at this time.		
<b>IV. 3 - Information on Liability and Defenses/Protections Where Organization Does NOT Own the Property</b>		

<b>Complete this section ONLY if your organization DOES NOT own the property.</b>
Did your organization arrange for the disposal of hazardous substances at the property or transport hazardous substances to the property? YES _____ NO _____
Did your organization cause or contribute to any releases of hazardous substances at the property ? YES _____ NO _____
Describe your relationship with the owner and the owner's role in the work to be performed.
How you will gain access to the property? YES _____ NO _____
<b>IV. 4 - Information on Liability and Defenses/Protections Where Organization Owns the Site or Will Own the Site During the Performance of the Assessment Cooperative Agreement</b>
<b>Complete this section ONLY if your organization own the property to be assessed or will own the property at some point during the performance of the cooperative agreement.</b>
<b>IV. 4.1 Information on the Property Acquisition</b>
How you acquired or will acquire ownership (e.g., by negotiated purchase from a private individual, by purchase or transfer from another governmental unit, by foreclosure of real property taxes, by eminent domain, or other (describe)) St. Lawrence County acquired the site by tax foreclosure.
Indicate the date you acquired or will acquire the property The transfer deed was recorded in the County Clerk's Office on April 09, 2014.
The name and identity of the party from whom you acquired or will acquire ownership (i.e., the transferor) Dongrove Holdings, Inc. The County has been advised that Dongrove's sole shareholder died intestate and that Dongrove has been dissolved dur to failure to pay its franchise taxes.
Describe all familial, contractual, corporate, or financial relationships or affiliations you have or had with all prior owners, operators, or transporters of the property (including the person or entity from which you acquired or will acquire the property). NONE
<b>IV. 4.2 Timing and/or Contribution Toward Hazardous Substances Disposal</b>
Identify whether all disposal of hazardous substances at the property occurred before you acquired (or will acquire) the property YES
Did you cause or contribute to any release of hazardous substances at the property before acquire the property? YES _____ NO <u>  X  </u>
Did you, at any time, arrange for the disposal of hazardous substances at the property or transport hazardous substances to the property? YES _____ NO <u>  X  </u>
<b>IV. 4.3 Pre-Purchase Inquiry</b>
Describe any inquiry by you or others into the previous ownership of the property you acquired (or will acquire). Title search as required in the Tax Foreclosure process.
Describe uses and environmental conditions of the property prior to taking ownership. The property formerly operated as the Jones and Laughlin iron ore processing plant. That had been the sole use for nearly 40 years prior to cessation of operations in the late 1970s. There has subsequently been some commercial and unsupervised salvaging at the site over the past 40 years.
The name and identity of the party from whom you acquired or will acquire ownership (i.e., the transferor). The county foreclosed against Dongrove Holdings, Inc. The Count

<p>Indicate any type of environmental site assessments (e.g., ASTM E1527-05 Phase I) performed at the property, the dates of each assessment, and the entity for which they were performed (state whether the assessment was performed specifically for you, or if not, the name of the party that had the assessment performed and that party's relationship to you). There have been several assessments on the site beginning in 1989. A subsurface investigation and environmental analyses were conducted by Atlantic Testing Laboratories, Ltd. (ATL) for the NYSDEC during the period of March to December, 1989. These investigations are described in the ATL report submitted February 9, 1990. The purpose of this work was to investigate subsurface conditions and groundwater characteristics in relation to the oil problem at the site. A 1993 report titled, "Asbestos/Demolition Survey and Landfill Feasibility Study for the J&amp;L Iron Ore Mine, Star Lake, New York" was completed by Jack Eisenbach Engineering, P.C. In 1993 a demolition and salvage contractor began work on some of the buildings, although work ceased before the buildings were completely dismantled. In 1995 the NYS Department of Labor informed the contractor of the requirements for handling friable asbestos and issued a license. The DEC indicated that specified construction and demolition debris could be disposed of on-site, and some materials were so disposed. It is unclear whether the contractor fully complied with the stipulations of the NYSDEC license and/or other state regulations. <b>A Phase I Environmental Assessment conducted by CDM in 1994. Subsequently, the New York State Department of Environmental Conservation and St. Lawrence County entered into a State Assistance Contract, Contract No. C302997, dated December 11, 2006.</b></p> <p>-- "Site Investigation Work Plan", dated March 2012, prepared by CDM Smith.</p> <p>-- "Site Investigation Report", dated January 2013, prepared by CDM Smith.</p> <p>-- "Alternatives Analysis", dated March 2013, prepared by CDM Smith.</p> <p>-- Proposed Remedial Action Plan for the Former Jones &amp; Laughlin Ore Processing site, dated February 2013, prepared by the Department.</p>
<p>Who performed the All Appropriate Inquiries investigation or Phase I environmental site assessment and identify his/her qualifications to perform such work. All of the aforementioned work was done by registered New York State engineering services firms. CDM/Smith is a large, internationally recognized engineering firm operating on NYS DEC Standby contracts.</p>
<p>Was the original AAI investigation or Phase I environmental site assessment conducted more than 180 days prior to the date you acquired the property?</p> <p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Did you conduct the appropriate updates of the original assessment within 180 days prior to your acquisition of the property in order to take advantage of the bona fide prospective purchaser, innocent landowner, or contiguous property owner provision.</p> <p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> The County would not take title to the property until the New York State Department of Environmental Conservation issued a Record of Decision and a Waiver of Environmental Liability for the site pursuant to the NYS ERP program.</p>
<p><b>IV. 4.4 Post-Acquisition Uses</b></p>
<p>Describe all uses to which the property has been put since you acquired ownership (or the uses that you anticipate once you acquire the property) through the present, including any uses by persons or entities other than you. NONE</p>
<p>Provide a timeline with the names of all current and prior users during the time of your ownership; the dates of all uses; the details of each use, including the rights or other reason pursuant to which the use was claimed or taken (e.g., lease, license, trespass); and your relationship to the current and prior users. NONE formally, although the site is not secure and trespass has clearly been evident in the past and is not possible to stop currently.</p>
<p><b>IV. 4.5 Continuing Obligations</b></p>
<p>Describe in detail the specific appropriate care that you exercised (or if you have yet to acquire the property, that you will exercise upon acquiring the property) with respect to hazardous substances found at the site by taking reasonable steps to:</p> <ol style="list-style-type: none"> <li>1. Stop any continuing releases;</li> <li>2. Prevent any threatened future release; and</li> <li>3. Prevent or limit exposure to any previously released hazardous substance.</li> </ol> <p>New York State has transferred the obligation for on-going remediation of a portion of the site to the US EPA and the EPA is now responsible for both remediation activities and monitoring. The County will comply with all aspects of the Site Management Plan. The County request for additional funding is to remove other contaminants not being addressed by the EPA to reduce the likelihood accidental dispersal into the environment caused by continuing site deterioration.</p>
<p>Describe in detail your commitment to:</p> <ol style="list-style-type: none"> <li>1. Comply with all land-use restrictions and institutional controls;</li> <li>2. Assist and cooperate with those performing the assessment and provide access to the property;</li> <li>3. Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and</li> <li>4. Provide all legally required notices. As a governmental entity, the County is fully compliant with all applicable "sunshine laws and requirements." Any future uses of the site would require approval by the Adirondack Park Agency and would also need to comply with the requirements of the ROD and the site management plan.</li> </ol>
<p><b>V - Property Location Map</b></p>
<p>Provide a property location map. The map should cover a radius of 2 miles.</p>

# Jones & Laughlin Remediation Site, State Highway 3 Town of Clifton, St. Lawrence County, New York



## **DRAFT Analysis of Brownfield Cleanup Alternatives**

### **Jones & Laughlin (J&L) Steel, Town of Clifton, New York**

## ***Introduction & Background***

### **1. Site Location**

The abandoned Jones & Laughlin (J&L Steel) iron ore processing facility is a 54.7 acre industrial property (Tax Map No. 214.000-04-22) located at 4669 State Highway 3 in the Town of Clifton, St. Lawrence County (coordinates 44.168334°, -74.994359°). The J&L Steel property is surrounded by the 3,300-acre Benson Mines property. Now abandoned, the Benson Iron Ore Mine was once the largest open pit magnetite mine in the world, at 2.5-miles long and 200 feet deep. The strip mine has filled with water over the years and now forms an approximately 300-acre lake along the northern border of the J&L site.

### **2. Previous Site Uses and Remediation Efforts**

The 54.7-acre iron ore processing facility was constructed and operated by the Defense Plant Corporation during World War II. Mining activities at the Site are recorded as early as the late 1880s, when the Magnetic Iron Company began developing the area on top of what they believed would be a valuable ore body. The Benson Mines Company started open pit mining operations at the Site and produced magnetite and non-magnetite ore intermittently through 1918; the mine closed from 1919 to 1941. The Site was re-opened in 1941 when the J&L Steel Corporation leased the Site and its mineral rights under the company name Jones and Laughlin Ore Co. The following year, a processing plant was built by the Defense Plant Corporation (created by Congress in the 1940s to expand the United States' production capabilities for military equipment; this included building new facilities and expanding existing structures). Following World War II, the plant was sold back to J&L Steel Corporation. With the improvement of the onsite facilities, mining and ore processing proceeded on a larger scale. At its peak of operation, the facility employed about 1,200 people. By the 1970's however, the ore processing and mining operations diminished and the plant ultimately ceased operation in 1977; it was sold for unpaid taxes and equipment and steel was scrapped from the site. In 1994, taxes were again unpaid and the site abandoned.

In 1987, a million-gallon oil spill was discovered on site. The New York State Department of Environmental Conservation (NYSDEC) was notified that an oil spill was discovered in the Little River, a tributary to the Oswegatchie River, adjacent to the Benson Mine. The Oswegatchie and its tributaries are part of the St. Lawrence River watershed.

The NYSDEC traced the spill back to the 54.7-acre former iron ore processing facility located on the J&L site and stated that it originated from multiple sources. The NYSDEC operated an oil recovery system in the 1990s, which is no longer in operation. As of 2012, 350,000 gallons of #2 fuel oil (of over one million gallons), had been recovered since the discovery of the spill.

In 2004, the St. Lawrence County Planning Office applied for and was awarded an Environmental Restoration Program (ERP) grant through the NYSDEC to conduct a comprehensive investigation of the site. These ERP funds provided 90 percent reimbursement for eligible costs to the County. St. Lawrence County (“County”) acquired temporary incidents of ownership through the In Rem foreclosure process in 2005, providing the County with access to the site to conduct its investigation. An environmental consulting firm was hired by the County to determine the nature and extent of contamination, as well as an appropriate remedy of the site. In order to maximize the use of these ERP funds, the site investigation ultimately focused on a 14.26-acre, less contaminated portion of the site. This process included public input on the selection of the cleanup remedy. Ultimately the NYSDEC issued a Record of Decision (ROD) in 2013 for the 14.26-acre portion of the site. The ROD for this portion of the site determined that no further remediation was required and allows for commercial or industrial development. In June 2014, the NYSDEC issued a Certificate of Completion (COC) on this portion of the site which provided the County with a release of environmental liability but also required the County to place an Environmental Easement which imposes certain use restrictions, including a prohibition against use of on-site groundwater, which run with the land.<sup>1</sup> The remaining (approximate) 36 acre portion of the site, which was not subject to the COC or the Environmental Easement, is contaminated with petroleum and CERCLA hazardous substances.

A 1,000-foot long, 15-foot deep polyvinyl curtain separates the contamination area from the Little River. The curtain however, is no longer holding back the plume and oil again is seeping into the river. The site was referred to the U.S. EPA in late 2013 and cleanup funded by the Oil Pollution Act of 1990/Oil Spill Liability Trust Fund commenced.

As a result of many years of unpaid taxes, St. Lawrence County acquired ownership of the property in April 2014 through the In Rem foreclosure process.

On June 27, 2014, NYSDEC referred the [36] acre portion of the Site to EPA to assess and consider the Site for a removal action to address CERCLA hazardous substances that are present and pose a potential threat of direct contact to human health. EPA reviewed the NYSDEC’s request along with associated assessment reports, and conducted two site inspections: the first on July 15, 2014 and the second on July 31, 2014. During site inspections, EPA observed friable asbestos-containing materials (ACM) in decaying bags in one building, as well as friable ACM pipe insulation on the floors of other buildings on the Site. EPA further observed mercury-containing devices (i.e. switches and components) within two Site buildings. These devices were in decaying condition and pose a potential threat of release. Along with the friable ACM and mercury devices, approximately one dozen small storage containers and drums of unknown material were observed within buildings throughout the Site. The Site is not fully secured and evidence exists of trespass or unauthorized entry. Along with the Site’s decaying buildings and infrastructure, EPA observed evidence of vandalism and unauthorized scrapping of ferrous and non-ferrous metal at the Site.

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<sup>1</sup> The Towns of Clifton and Fine are undertaking capital improvement projects to provide water service to the J&L and these projects are planned to be complete in 2018.



EPA initiated its first CERCLA removal action at the Site on 9/15/2014. The initial removal action (RV1) addressed the threats to the public from asbestos found in bags at the site, mercury devices (switches and gauges) found in buildings 7 and 20, and containerized liquid and solid wastes found on-site. The RV1 removal action was completed on 11/18/2014. During the RV1 removal action, EPA conducted additional assessment of friable ACM within the buildings. The assessment indicated ACM in plaster materials within buildings 2, 3, and 7. Following the review of the assessment data and considering the degrading condition of the Site buildings, a decision was made to conduct a second removal action (RV2) to address the threats from the friable ACM within buildings 2, 3, and 7. In total, the EPA spent \$808,697 to complete the activities identified in CERCLA removal actions RV1 and RV2.

### **3. Site Assessment Findings**

The site has been fully assessed and results are documented in several historical reports dating from 1989 to the most recent study, completed in 2014 (Parsons Preliminary Site Characterization Report for the Former J&L Steel Site, October 2014). Supplemental investigation work was conducted at the site and the final Parsons Site Characterization Report for the Former J&L Steel Site, August 2016.

Prior investigations conducted at the site include a preliminary subsurface investigation (Atlantic Testing Laboratories, 1989); asbestos/demolition survey (Jack Eisenbach Engineering, PC, 1994); a Phase I/Phase II Assessment (CDM, 1994); and a site investigation completed in 2009 (CDM, 2009).

The primary site contamination remaining includes the subsurface #2 Fuel Oil spill; friable and non-friable asbestos-containing building materials such as pipe insulation, transite panels, floor tiles, ceiling tiles, and other asbestos-containing materials; and PCB-containing window glazing and caulk.

### **4. Project Goal**

The goal of this project is to remediate asbestos and other hazardous materials from dilapidated buildings that are located on the [36] acre portion of the Site which is in close proximity to NYS Route 3 and the 14.26-acre portion of the site subject to the ROD, COC and Environmental Easement. This area includes a seasonal boat washing station to prevent the spread of waterborne invasive species. Remediation/demolition of on-site buildings will eliminate potential public health hazards and facilitate the ultimate cleanup and redevelopment of the 36-acre portion of the site.

## ***Applicable Regulations and Cleanup Standards***

### **1. Cleanup Oversight Responsibility**

The site work performed to date has been overseen by the NYSDEC and the EPA; cleanup outlined as the scope of work proposed in the application to FY2017 U.S. EPA Brownfields Cleanup Grant Program will continue to be overseen in the same manner. Additionally, cleanup activities will be overseen by a licensed engineer with expertise in environmental remediation.

### **2. Cleanup Standards**

At the present time, industrial re-use is being marketed to maximize the value of the limited amount of industrially classified properties located within the Adirondack Park. Additionally, St. Lawrence County worked with the NYSDEC to obtain a beneficial use determination approval to re-use clean crushed concrete and masonry for backfill on the Site. This will significantly reduce costs in two ways: 1) reducing the total volume of material to be hauled off-site; and 2) providing fill that is necessary to fill large voids that will be created through the demolition of structures containing basements.

### **3. Laws & Regulations Applicable to the Cleanup**

Laws and regulations that are applicable to the cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act; the Federal Davis-Bacon Act; Resource Conservation and Recovery Act; federal environmental laws including, but not limited to, the Clean Water Act; National Emission Standards for Hazardous Air Pollutants; and New York State laws, including the Environmental Conservation Law, and the State Environmental Quality Review Act (SEQRA), solid waste management disposal laws and regulations and the New York Navigation Law (with respect to the underground oil spill).

Remediation efforts through an initial phase of building demolition were initiated in the fall of 2016. The NYS Department of Labor has provided permits for asbestos abatement and St. Lawrence County and the Town of Clifton provided permits for demolition. Contractors working onsite are in compliance with the Occupational Safety & Health Act. All appropriate permits were obtained prior to commencing work in November 2016.

Building demolition has been phased due to funding limitations. Phase 1, which will demolish 11 buildings, began in the fall of 2016 and will carry over to spring 2017. St. Lawrence County and other stakeholders are working to secure funding to complete demolition of the remaining 16 buildings in a second phase, anticipated to commence in late 2017. St. Lawrence County expects that NYS Department of Labor permits for asbestos abatement and St. Lawrence County and the Town of Clifton permits for demolition will be obtained for Phase 2 in the same manner as they were for Phase 1. Contractors working on site will be required to comply with the Occupational Safety & Health Act. All appropriate permits will be obtained prior to commencing Phase 2.

## ***Evaluation of Cleanup Alternatives***

### **1. Cleanup Alternatives Considered**

To address contamination at the site, the following alternatives were considered:

- Alternative #1: No Action; or
- Alternative #2: Abatement of hazardous materials from onsite structures with *offsite* disposal; or
- Alternative #3: Abatement of hazardous materials from onsite structures with *onsite* disposal.

### **2. Assessment of Cleanup Alternatives**

#### ***Effectiveness***

- Alternative #1: No Action is not effective in controlling or preventing the exposure to receptors by contaminants from the site.
- Alternative #2: Abatement of hazardous materials from onsite structures with *offsite* disposal provides an effective alternative that eliminates the hazards from structures onsite. The County plans to continue to pursue additional funding to complete full site cleanup and redevelopment.
- Alternative #3: Abatement of hazardous materials from onsite structures with *onsite* disposal was previously considered. A report detailing the feasibility of onsite disposal of asbestos and other C&D was documented in a report compiled by Tisdell Associates in 1993. Onsite disposal was determined to be infeasible given the current permitting requirements, the reduced disposal costs which were awarded by the Development Authority of the North Country to St. Lawrence County for this project, and because leaving materials onsite will eliminate a large section of the property which could be re-developed for future beneficial use. Additionally, creating an onsite solid waste management facility would create ongoing site monitoring requirements that would increase the life cycle costs of this alternative.

### *Ability to Implement*

- Alternative #1: No Action requires no implementation steps.
- Alternative #2: Abatement of hazardous materials from onsite structures with offsite disposal can continue with assistance from the U.S. EPA Brownfield Cleanup Grant Program. Contract documents that detail the requirements for demolition and abatement contractors to effectively and safely abate the hazardous materials located in structures were developed for Phase 1 of remediation/demolition. These documents were developed in anticipation of a phased approach and will be easily modified/updated to accommodate the scope of Phase 2 efforts as funding levels for the phase are determined. St. Lawrence County understands that US EPA funding may require Phase 2 to be re-bid; any necessary contract documents will modeled on documents successfully utilized in Phase 1.
- Alternative #3: Abatement of hazardous materials from onsite structure with onsite disposal would require an extensive amount of time and funds to complete the environmental permitting process. Additionally, given that the Site is located within the Adirondack Park and several environmental advocacy groups are interested in this project, onsite disposal is both impractical and unfeasible.

### *Cost*

- Alternative #1: No Action will have no associated costs.
- Alternative #2: Abatement of hazardous materials from onsite structures with offsite disposal is estimated to cost \$1.6 million. Given that St. Lawrence County bid the entire project in 2016, with separate pricing per building, accurate pricing is available and the project is ready to proceed with additional remediation, pending an award of funding. Additionally, the Development Authority of the North Country, a New York State Public Benefit Corporation that owns and operates a Part 360 Permitted Solid Waste Management Facility, has awarded a tip fee reduction for the J&L project since this is a priority project for economic development in St. Lawrence County.
- Alternative #3: Abatement of hazardous materials from onsite structure with onsite disposal. St. Lawrence County's 2016 bid process provided definitive costs for transportation and disposal, which are significantly less than estimates of capital costs to design, permit and construct a solid waste management facility onsite to permanently store asbestos, and the ongoing monitoring and reporting costs that would be required to maintain such a disposal facility. Rough estimates of the cost to permit and construct an onsite landfill at J&L would cost upwards of \$10M and take more than two years to complete permitting and construction. A

full Environmental Impact Statement would be required. Public support from the community for onsite disposal is not favorable and it is likely that this alternative could stall during the environmental review process given the site is located in the Adirondack Park and in close proximity to areas used for recreational activities.

### ***Resiliency***

With respect to reasonably foreseeable changing climate conditions, cleanup alternatives have the following considerations:

- Alternative #1: No Action would likely result in continued and perhaps accelerated decay of onsite structures. This would increase the total volume of hazardous materials exposed to the elements and, as a secondary effect, increase the probability of broader contamination through the spread of these materials into waterways.
- Alternative #2: Abatement of hazardous materials from onsite structures with offsite disposal would provide the greatest resiliency to changing climate conditions by removing hazardous materials from the site altogether and placing these hazardous materials in a permitted Solid Waste Management Facility (SWMF) in Rodman, New York. The SWMF was sited in Rodman in 1992 as a state of the art regional solid waste disposal site designed due to accept waste from a four county area in the North County when local municipal “dumps” were taken out of service. The extremely low hydraulic conductivity of the soils in the area, remote proximity, site elevation, and other environmental factors make the Rodman SWMF an ideal location for the site and the most resilient option for disposal of waste generated from the J&L site cleanup.
- Alternative #3: Abatement of hazardous materials from onsite structure with onsite disposal presents greater risk for exposure than offsite disposal. Siting a permanent SWMF at the J&L site is not ideal given the site hydrogeology, proximity to natural resources including the Little River, location in the Adirondack Park, and presence of onsite soil and groundwater contamination. Portions of the site, adjacent to the Little River, may also be susceptible to flooding. Flooding presents a serious problem for SWMFs as leachate from the landfill cells, which could be contaminated with fuel oil and PCBs, would have to be collected and disposed of offsite. The closest waste water treatment plant that could handle this type of wastewater is located over 60 miles away and wastewater would have to be transported in tanker trucks.

### **3. Recommended Cleanup Alternative**

The recommended cleanup alternative is Alternative #2: Hazardous material abatement from onsite structures with *offsite* disposal. This alternative is the lowest cost option, provides the most effective solution to addressing and mitigating potential public health hazards associated with onsite contamination, and is most closely aligned with stakeholder's visions for future site redevelopment.

## **LEGAL NOTICE**

### **NOTICE OF PUBLIC MEETING REGARDING ST. LAWRENCE COUNTY'S APPLICATION TO THE U.S. EPA BROWNFIELDS CLEANUP GRANT PROGRAM FOR REMEDIATION/ABATEMENT ACTIVITIES AT THE FORMER JONES & LAUGHLIN SITE, TOWN OF CLIFTON, NY**

St. Lawrence County intends to apply for funds from the U.S. EPA Brownfields Cleanup Grant Program, Fiscal Year 2017. Funds will be requested to aid in the remediation/abatement of hazardous substances (asbestos-containing materials and PCB-infused materials) potentially found in structures located on the site of the Former Jones & Laughlin Ore Company (J&L Steel) located at 4669 State Route 3, in the Town of Clifton, New York.

A public meeting about the project will be held on Wednesday, December 14, 2016 at 6:30PM in the Town of Clifton municipal office building at 66 River Road, Newton Falls, New York, 13666.

The public meeting is being held to give the public the opportunity to review and comment on the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA). All comments will be incorporated into an Exhibit to be attached to the grant application package, pursuant to U.S. EPA program guidelines.

A hard copy of the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA) will be made available for public review and comment at the St. Lawrence County Planning Office, Room S13, 2<sup>nd</sup> Floor of the Public Safety Complex, 48 Court Street, Canton, New York, 13617, beginning December 5, 2016.

For questions or accessibility accommodations, please contact:

**Heidi J. Ames, Grants Manager**  
St. Lawrence County Planning Office  
Public Safety Complex, 2<sup>nd</sup> Floor  
48 Court Street, Canton, NY 13617  
315-379-2292 Telephone  
315-379-2252 Fax  
[hames@stlawco.org](mailto:hames@stlawco.org)

STATE OF NEW YORK  
COUNTY OF JEFFERSON

WATERTOWN DAILY TIMES

JOHN MONTAN  
ST LAW CTY PLANNING OFFICE  
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CANTON NY 13617REFERENCE: 28339  
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Amy Schultz, of the Town of Brownville, County of Jefferson, being duly sworn, says that she is a Legal Representative of the Johnson Newspaper Corp., a corporation duly organized and existing under the laws of the State of New York, and having its principal place of business in the City of Watertown, New York, and that said corporation is the publisher of the WATERTOWN DAILY TIMES, a Newspaper published in the City of Watertown, Jefferson County, and State of New York, and that a Notice, of which the annexed is a printed copy, has been published regularly in the said Newspaper.

  
AMY SCHULTZ, LEGAL REPRESENTATIVE

PUBLISHED ON: 12/01

AD SPACE: 92 LINE  
FILED ON: 12/01/16

Sworn to before me this

6 day of Dec, 2016  
  
Notary Public

PAULA K DELONG  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01DE6091238  
Qualified in Lewis County  
My Commission Expires April 28, 2019

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hames@stlawco.org



## **PRESS RELEASE – FOR IMMEDIATE RELEASE**

### **PUBLIC MEETING REGARDING ST. LAWRENCE COUNTY’S APPLICATION TO THE U.S. EPA BROWNFIELDS CLEANUP GRANT PROGRAM FOR REMEDICATION/ABATEMENT ACTIVITIES AT THE FORMER JONES & LAUGHLIN SITE, TOWN OF CLIFTON, NY**

St. Lawrence County intends to apply for funds from the U.S. EPA Brownfields Cleanup Grant Program, Fiscal Year 2017 to aid in the remediation/abatement of hazardous substances (asbestos-containing materials and PCB-infused materials) potentially found in structures located on the site of the Former Jones & Laughlin Ore Company (J&L Steel) located at 4669 State Route 3, in the Town of Clifton, New York.

A public meeting about the project will be held on Wednesday, December 14, 2016 at 6:30PM in the Town of Clifton municipal office building at 66 River Road, Newton Falls, New York, 13666.

The public meeting is being held to give the public the opportunity to review and comment on the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA). All comments will be incorporated into an Exhibit to be attached to the grant application package, pursuant to U.S. EPA program guidelines.

A hard copy of the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA) will be made available for public review and comment at the St. Lawrence County Planning Office, Room S13, 2<sup>nd</sup> Floor of the Public Safety Complex, 48 Court Street, Canton, New York, 13617, beginning December 5, 2016.

For questions or accessibility accommodations, please contact:

**Heidi J. Ames, Grants Manager**

St. Lawrence County Planning Office

Public Safety Complex, 2<sup>nd</sup> Floor

48 Court Street, Canton, NY 13617

315-379-2292 Telephone

315-379-2252 Fax

[hames@stlawco.org](mailto:hames@stlawco.org)

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## Local Business

### St. Lawrence County will seek funding to clean up former J&L Steel site; public input sought

Friday, December 2, 2016 - 6:04 am

CANTON -- St. Lawrence County will seek Brownfields Cleanup Grant funding to aid in the remediation and abatement of hazardous substances found in structures on the site of the Former Jones & Laughlin Ore Company in Clifton.

A public meeting about the project will be held on Wednesday, Dec. 14, at 6:30 p.m. in the Town of Clifton municipal office building at 66 River Road, Newton Falls, New York, 13666.

The public meeting is being held to give the public the opportunity to review and comment on the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA). All comments will be incorporated into an Exhibit to be attached to the grant application package, pursuant to U.S. EPA program guidelines.

A hard copy of the draft proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA) will be made available for public review and comment at the St. Lawrence County Planning Office, Room S13, 2nd Floor of the Public Safety Complex, 48 Court Street, Canton, New York, 13617, beginning December 5.

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- Twenty young professionals are encouraged to use potential to better the north country
- 11 disqualified from benefits in November
- Massena Central School District receives \$12,500 to promote healthy choices
- Stefanik backs Mattis for Secretary of Defense, wants discussion on granting waiver

## Public meeting scheduled for Dec. 14 to discuss cleanup grant

PUBLISHED: THURSDAY, DECEMBER 1, 2016 AT 2:08 PM



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NEWTON FALLS — St. Lawrence County intends to apply for funds from the U.S. EPA Brownfields Cleanup Grant Program to aid in the remediation/abatement of hazardous substances (asbestos-containing materials and PCB-infused materials) potentially found in structures located on the site of the Former Jones & Laughlin Ore Company (J&L Steel) located at 4669 Route 3, in the Town of Clifton.

A public meeting about the project will be held on Dec. 14, at 6:30 p.m. in the Town of Clifton municipal office building at 66 River Road, Newton Falls.

The public meeting is being held to give the public the opportunity to review and comment on the draft proposal and draft Analysis of Brownfield Cleanup Alternatives. All comments will be incorporated into an exhibit to be attached to the grant application package.

A hard copy of the draft proposal and draft Analysis of Brownfield Cleanup Alternatives will be made available for public review and comment at the St. Lawrence County Planning Office, Room S13, 2nd Floor of the Public Safety Complex, 48 Court Street, Canton. Beginning Dec. 5.

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# **FY2017 U.S. EPA Brownfields Cleanup Grant Program St. Lawrence County Proposal Summary**

**PUBLIC HEARING - 6:30 PM Wednesday, December 14, 2016  
Town of Clifton Municipal Building, 66 River Road, Newton Falls, NY, 13666**

St. Lawrence County intends to apply for \$200,000 from the U.S. EPA Brownfields Cleanup Grant Program, Fiscal Year 2017. If awarded, grant funds will be utilized for the removal and disposal of contaminant materials from structures on the former J&L site in Clifton, NY. Phase One of building demolition began in November 2016, with a budget of \$588,000 including engineering services, construction administration and inspection, asbestos air monitoring, construction (demolition and removal) financing costs and contingencies. This phase is anticipated to demolish 11 structures on the J&L site.

An additional \$1.6 million is sought to complete demolition of the remaining 16 structures. Anticipated sources of those funds include:

<b>Amount</b>	<b>Source</b>	<b>Status</b>
\$500,000	Restore NY Grant (NYS ESD)	Pending; application submitted September 2016
\$200,000	U.S. EPA	Current application; due December 22, 2016
\$280,000	NYS ESD	Anticipated application under the 2017 CFA
\$250,000	Northern Border Regional Commission (Federal)	Anticipated application in Federal Fiscal Year 2017
\$300,000	National Grid	Anticipated 2017 application under National Grid Brownfield Redevelopment Program
\$70,000	Local funds	Local stakeholders contributed \$53,500 toward Phase 1 demolition budget

The U.S. EPA Brownfields Cleanup Grant is expected to be a portion of the larger \$1.6 million project. It requires a 20% local cost share (\$40,000) and the anticipated proposed budget is as follows:

<b>Task</b>	<b>Cost</b>
Hazardous Material Abatement/Demolition	\$198,000
Construction Management/Inspection	\$11,700
Asbestos Air Monitoring	\$17,800
Programmatic Expenses	\$10,000
Legal Expenses	\$2,500
<b>TOTAL:</b>	<b>\$240,000</b>

The application – which has been available for public review and comment at the County Planning Office since December 5, 2016 – is comprised of a narrative description of the proposal, the capacity of the applicant to accomplish the work, threshold eligibility documentation, an analysis of brownfield cleanup alternatives (ABCA) and locator maps.

The site is a current EPA cleanup site and the County has obtained an eligibility determination allowing it to pursue this funding opportunity. For Fiscal Year 2017, the EPA has an estimated \$54 million available for Brownfields Assessment and Cleanup Grants. It is estimated that, nationwide, 60 cleanup projects totaling \$12 million may be awarded.

This application, and the related scope of work, is a collaborative effort of St. Lawrence County, the Clifton-Fine Economic Development Corporation, the St. Lawrence County Industrial Development Agency, the Development Authority of the North Country, and the Towns of Clifton and Fine.

Other documents available for review, comment, and questions:

- **Draft Analysis of Brownfields Cleanup Alternatives (ABCA)**
- **Draft Narrative Proposal**
- **Draft Response to Section III.B. Threshold Criteria for Cleanup Grants**

# **FY2017 U.S. EPA Brownfields Cleanup Grant Program**

## **ST. LAWRENCE COUNTY PUBLIC HEARING SUMMARY**

A public hearing was noticed and held pursuant to FY17 Guidelines. Nine members of the public attended the hearing on December 14, 2016, which was opened at 6:30pm by Charles Hooven, Supervisor of the Town of Clifton.

A proposal summary (see attached meeting materials) was reviewed. Other documents available for review, comment, and questions included:

- **Draft Analysis of Brownfields Cleanup Alternatives (ABCA)**
- **Draft Narrative Proposal**
- **Draft Response to Section III.B. Threshold Criteria for Cleanup Grants**

There were no questions and no substantive comments on the ABCA, the draft application, or the funding program/application process. The hearing was adjourned at 6:45pm. A copy of the legal notice; Affidavit of Publication; press release; local news articles about the meeting/project; meeting materials; meeting summary and sign-in sheet are attached.

Respectfully Submitted,

Heidi J. Ames  
St. Lawrence County Grants Manager



**PUBLIC HEARING**  
**St. Lawrence County Application to**  
**FY2017 U.S. EPA Brownfields Cleanup Grant Program**

6:30 PM Wednesday, December 14, 2016  
Town of Clifton Municipal Building, 66 River Road, Newton Falls, NY, 13666

Name (Please Print)	Address	Optional - Other Contact Information (phone/e-mail)
Lisa Langevin	PO Box 137 Star Lake, NY 13690	
Rod Langevin	PO Box 137 Star Lake NY 13690	
Mary Zuhlsdorf	Box 714 Cranberry Lake NY 12927	
Cory Perreault	Box 92 Star Lake N.Y. 13690	
Sharon Snider	4455 SH3 STAR LAKE, NY 13690	
Charles Hooven	23 Mill St. Cranberry Lake N.Y. 12927	
Julia Landhear	25 Mill Street Cranberry Lake, NY 12927	
John Rusien	1336 River Road Newton Falls NY 13666	
Kelly Smith	15 Pennsylvania Ave Cranberry Lake, NY 12927	

## J&L Steel Abatement/Demolition – Phase 2 Committed Leveraged Resources

Phase Two carries a total cost of \$1.6 million; the County and local stakeholders anticipate the following sources of funds are necessary and attainable to fully fund Phase Two and complete abatement/demolition activities at the J&L site:

J&L Abatement/Demolition – Phase Two		
Amount	Source	Status
\$500,000	Restore NY Grant (NYS Empire State Development)	Pending; application submitted September 2016
\$200,000	U.S. EPA	Current application to FY 2017 Program
\$280,000	NYS Empire State Development*	Anticipated application under the 2017 Consolidated Funding Application (CFA)
\$250,000	Northern Border Regional Commission	Anticipated application in Federal Fiscal Year 2017
\$300,000	National Grid Brownfield Redevelopment Program*	Anticipated 2017 application
\$70,000	Local funds	Local stakeholders anticipate raising a maximum of \$70,000 from local sources, as demonstrated in Phase One.
<b>\$1,600,000 Total - Phase Two</b>		

\*These two programs require other sources to become available as anticipated to be available in the respective amounts shown. Empire State Development funds through this program may account for only 20% of the total eligible costs, while National Grid has a maximum amount of \$300,000 that must be 25% or less of total eligible costs.

It should also be noted that the abatement/demolition activities proposed in this application are integrally related to a broader scope of redevelopment activities at the J&L site. The J&L Redevelopment project is a Priority Project of the North Country Regional Economic Development Council, appointed by Governor Andrew Cuomo in 2011, as a means to re-structure community and economic development in the State of New York by facilitating a “bottom-up” approach. A rail project connecting to J&L received \$10 million in NYS Empire State Development funds leveraged by an additional \$1 million local share (see attached award letter), as well as \$234,155 in Federal funds from the Northern Border Regional Commission.

The County, the St. Lawrence County IDA, Development Authority of the North Country and Clifton-Fine Economic Development Corporation have demonstrated the ability to coordinate the fiscal and logistical requirements of Phase One abatement/demolition activities at the site. Each has committed its agency’s resources and staff capacity to ensure successful completion of Phase Two. Please see the provided letters of commitment.



Raymond Fountain  
Director  
St. Lawrence County IDA  
80 State Highway 310, Suite 6  
Canton, NY 13617

Re: Newton Falls Rail Rehabilitation, CFA #2281

Dear Raymond Fountain:

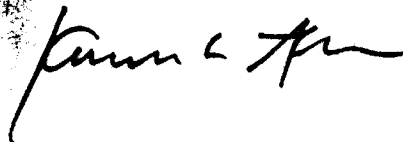
In July, as part of a historic initiative to transform New York State's model for economic development and job creation, Governor Cuomo announced that up to \$1 billion in economic development funding would be made available through a Consolidated Funding Application (CFA), marking a fundamental shift in how economic development resources are allocated.

In the past, funding has been supported by several different agencies and sources across state government, without any mechanism to coordinate allocations. The CFA process redesigned and streamlined the way economic development projects in New York receive funding to ensure that the best projects with the most potential for regional economic growth receive the support they need from the local level. These CFA project awards were based on the endorsement of the local Regional Council and the technical scoring of Empire State Development ("ESD").

Based on our initial assessment of your project, we are pleased to inform you that St. Lawrence County IDA has been awarded an estimated amount of up to \$9,972,000 in funding from the Regional Economic Development Council Capital Fund Program. ESD's North Country Regional Office will contact you to clarify specifics about the project in order to issue a formal Incentive Proposal. The Incentive Proposal, which must be signed and returned to ESD, will outline funding requirements, including next steps, disbursement terms, minority- and women-owned business hiring goals, employment requirements, environmental and historic preservation review requirements, and other terms and conditions required by the ESD funding processes. Please note that grant funding must be approved by the ESD Directors, which typically occurs at the time of project completion, and that funds are disbursed in arrears, as reimbursement for expenses undertaken.

Congratulations, and we look forward to working with you on this important project.

Best regards,



Kenneth Adams  
President and CEO, Empire State Development  
Commissioner, NYS Department of Economic Development

cc: Randal Coburn  
Susan Shaffer  
Roseanne Murphy



# ST. LAWRENCE COUNTY INDUSTRIAL DEVELOPMENT AGENCY LOCAL DEVELOPMENT CORPORATION

Ernest J. LaBaff Industrial Building ~ 19 Commerce Lane, Suite 1 ~ Canton, New York 13617  
Phone: (315) 379-9806 / TDD: 711 ~ Fax: (315) 386-2573 ~ [www.SLCIDA.com](http://www.SLCIDA.com)

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**Andrew McMahon**  
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**R. Joseph Weekes, Jr.**  
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**Patrick J. Kelly**  
St. Lawrence County  
Industrial Development  
Agency

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St. Lawrence County  
Industrial Development  
Agency

December 16, 2016

Ruth A. Doyle, Administrator  
St. Lawrence County  
48 Court Street  
Canton, NY 13617

**RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant**

Dear. Ms. Doyle:

The St. Lawrence County Industrial Development Agency ("IDA") is pleased to support St. Lawrence County's application for a Fiscal Year 2017 U.S. EPA Brownfield Cleanup Grant in the amount of \$200,000 to remediate asbestos-containing materials and other potential hazardous substances found in abandoned industrial structures at the J&L site in Clifton, New York. As you are aware, remediation of hazardous materials through demolition of these dilapidated structures is critical to local revitalization efforts.

The IDA is a NYS Public Benefit Corporation with a mission to promote, encourage, attract, and develop job opportunities and economically sound commerce and industry in St. Lawrence County. The IDA strongly believes that the ongoing deterioration and blighted appearance of the J&L site is a detriment to the economic and community development activities in Southern St. Lawrence County. The buildings are an eyesore, they convey an aura of decay and economic failure to both residents and visitors alike along a main thoroughfare through an otherwise pristine Adirondack landscape.

The IDA is committed to the remediation and redevelopment of the former J&L property. This commitment has been demonstrated over the last several years by the following efforts:

- the dedication of capital and staff,
- entering into agreements with the Development Authority of the North Country to provide technical assistance and Project Management Services,
- the securing of a 2012 Empire State Development (ESD) grant in the amount of \$87,500 to develop building demolition plans and specifications,
- securing \$18,000 from the River Valley Redevelopment Agency (RVRDA) as local match to the Phase I building demolition project
- securing a 2011 ESD grant in the amount of \$9,972,000 to rehabilitate the 46.15 mile Carthage to Newton Falls railroad which passes through this site,
- engaging neighboring industrial property owners in discussions about potential reuses, and meeting with numerous stakeholders, regulatory authorities, state officials, and potential business ventures about returning the site to productive use and stimulating economic development in the Clifton-Fine region.

Page 2

U.S. EPA Brownfields Cleanup Grant

Finally, the IDA has assumed project management and fiscal responsibility for the building demolition project, assembling the local matching funds required for the various grants that have been awarded for the project thus far, and providing the upfront funding necessary in order to move the project forward while awaiting reimbursement from the grants.

Please do not hesitate to contact me to discuss the St. Lawrence County Industrial Development Agency's role in this project and the potential impact that EPA funds will have on advancing this critical step in the revitalization of the former J&L site.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Patrick Kelly', written over a light blue horizontal line.

Patrick Kelly  
Chief Executive Officer



**Development Authority of the North Country**

Dulles State Office Building  
Watertown, New York 13601

Gary Turck  
Chairman of Board

James W. Wright  
Executive Director

December 14, 2016

Ms. Ruth Doyle  
St. Lawrence County Administrator  
48 Court Street  
Canton, New York 13617

Re: U.S. EPA Brownfields Cleanup Grant

Dear Ms. Doyle:

On behalf of the Development Authority of the North Country, I offer support for St. Lawrence County's application to the U.S. Environmental Protection Agency's Brownfields Cleanup Grant Program in the amount of \$200,000 to remediate asbestos-containing materials and other potentially hazardous substances found in abandoned industrial structures at the J&L site in Clifton, New York. The cleanup of this former industrial site in the Adirondack Park is a priority, not only for the community but the County and region as well.

The Development Authority is a New York State public benefit corporation, created to serve the interests of a three-county region of Jefferson, Lewis, and St. Lawrence Counties.

As you are aware, the Development Authority has been working closely with you, the St. Lawrence County Industrial Development Agency, and the Town of Clifton in the development of this phased project by providing project oversight. To date, you have been successful in funding the first phase of the project totaling over \$550,000 in investment from local, state, and private sources. The work to be completed will remove hazardous materials, debris, and eight structures on the site. By completing this work, the community hopes to redevelop this site for future commercial and recreational use.

The Authority is committed to continuing to participate on the redevelopment team, collaborating to see this site remediated and revitalized.

In order to move forward with the next phase to remediate asbestos-containing materials and other potential hazardous substances found in remaining abandoned buildings on the site, the County needs additional funding. It continues to leverage local, state, and private resources with federal sources.

We look forward to working with you on the future redevelopment of this site. Again, on behalf of the Development Authority of the North Country, I support your application to the U.S. Environmental Protection Agency's Brownfield Cleanup Program to assist with cleanup at the former J&L site.

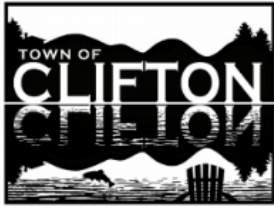
Should you have any questions or wish further information or discussions, please feel free to contact the Authority's Director of Engineering, or myself, at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Wright', is written over the typed name and title.

James W. Wright  
Executive Director





## TOWN OF CLIFTON

PO Box 685

7171 St. Hwy 3, Cranberry Lake, NY 12927

SUPERVISOR CHARLES R. HOOVEN

PHONE: (315)848-2369 FAX: (315)848-2369

December 21, 2016

Ruth A. Doyle, Administrator  
St. Lawrence County  
48 Court Street  
Canton, NY 13617

**RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant**

Dear Ms. Doyle:

The Town of Clifton is pleased to support St. Lawrence County's application for a Fiscal Year 2017 U.S. EPA Brownfield Cleanup Grant in the amount of \$200,000 to remediate asbestos-containing materials and other potential hazardous substances found in abandoned industrial structures at the J&L site in Clifton, New York. Remediation of hazardous materials through demolition of these dilapidated structures is critical to local revitalization efforts.

The Town of Clifton is pleased to participate on the team of local, regional and State stakeholders collaborating to see this site remediated and revitalized; it has provided \$10,000 to go for engineering, abatement and demolition in phase 1 of the project and also provided office space for public meetings. It will continue to engage in this process by continuing to provide office space for public meetings, in sharing information, assisting with community outreach and providing thoughtful input into revitalization discussions and activities.

Please do not hesitate to contact me to discuss the Town of Clifton's role in this project and the potential impact that EPA funds will have on advancing this critical step in the revitalization of the former J&L site.

Sincerely,

Charles R. Hooven

*Town of Clifton is an Equal Opportunity Provider/Employer. To file a complaint of discrimination, write to: USDA, Assistant Secretary for Civil Rights, Office of the Assistant Secretary for Civil Rights, 1400 Independence Ave., S.W., Stop 9410, Washington, D.C. 20250-9410.*

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*NYS Hearing Impaired Relay 1-800-622-1220*



**(315) 848-3121**

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Star Lake, NY 13690  
Fax: (315) 848-3152

[www.aFineAdirondackTown.org](http://www.aFineAdirondackTown.org)  
TDD: NYS Relay 711

December 16, 2015

Ms. Ruth Doyle, Administrator  
St. Lawrence County  
48 Court Street  
Canton, NY 13617

RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant

Dear Ruth:

As the Supervisor of the Town of Fine, neighbor to the J & L site, it is with great enthusiasm that I lend support to St. Lawrence County's application captioned above. The Town of Fine has suffered aesthetic and economic loss resulting from the closing and abandoning of the J & L site in Clifton.

The Town of Fine will participate on the team of local, regional and State stakeholders collaborating to see this site remediated and revitalized. With the strategic location of our Town Municipal Offices, we are prepared to provide the following:

- Satellite office space and Town phone number to individuals/ agencies involved - cell phone coverage is limited in our area and I will make our land lines available.
- Meeting space in our Board room.
- Public education space.
- Community Outreach via the Town Website.
- Staff support – receive and record messages when appropriate.
- Office machines in the form of computers, copiers, fax machines, projectors, scanners, etc.

As you well know, Ruth, your support and assistance with continuing efforts in the Clifton-Fine Community are needed for remediation of this property thereby promoting its reuse and economic development.

I look forward to hearing from you to discuss the Town of Fine's role in this process.

Sincerely,

Susan N. Westbrook  
Supervisor

The Town of Fine, is an equal opportunity provider & employer.



## Adirondack Park Agency

**SHERMAN CRAIG**  
Chairman

**TERRY MARTINO**  
Executive Director

December 14, 2016

Ms. Lya Theodoratos  
EPA Region 2  
290 Broadway; 18<sup>th</sup> Floor  
New York, NY 10007

**RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant**

Dear Ms. Theodoratos:

The New York State Adirondack Park Agency is pleased to support St. Lawrence County's application for a \$200,000 U.S. EPA Brownfield Cleanup grant to remediate hazardous substances at the former Jones and Laughlin Steel (J&L) site in the Town of Clifton, New York. The revitalization of this site is critical to the towns of Clifton and Fine, which combined have lost 39% of their populations since 1960 and where the median incomes are 53% and 74% of New York State's median income. The EPA's funding support will allow important site remediation work that is anticipated to bring new opportunity to the communities.

The J&L site is located in New York's Adirondack Park, the largest park in the continental United States and a unique patchwork of public and private lands where more than 130,000 people reside in 101 towns and villages. The enabling legislation that established the Park strives for a balance between environmental protection and economic development. Unfortunately, the J&L Steel site remains an environmental hazard and blight which local and State policy makers have worked to remediate for more than two decades.

Successful remediation will offer new opportunities in the region. New York State is funding the \$9 million redevelopment of a rail line to revitalize a neighboring vacated mine and provide rail access to potential new value-added manufacturers that could locate at the J&L site. Additionally, the community is anchored by the State University of New York's Environmental Science and Forestry' Ranger School which offers coursework in natural resource conservation, land surveying, and forest technology. The potential for economic development through re-use of the J&L site has led both New York State and the North Country Regional Economic Development Council to consider this venture a priority project.

With the assistance of the United States Environmental Protection Agency, I am confident the J&L Steel site will be transformed into a model of site reclamation and redevelopment. We appreciate your consideration of this important project.

Sincerely,

Terry Martino  
Executive Director



**CLIFTON-FINE ECONOMIC DEVELOPMENT CORPORATION  
PO BOX 115  
WANAKENA, NEW YORK 13695**

December 16, 2016

Ruth A. Doyle, Administrator  
St. Lawrence County  
48 Court Street  
Canton, NY 13617

**RE: St. Lawrence County application to the FY17 U.S. EPA Brownfields Cleanup Grant**

Dear Ms. Doyle:

The Clifton-Fine Economic Development Corporation (CFEDC) is pleased to enthusiastically support St. Lawrence County's application for a Fiscal Year 2017 U.S. EPA Brownfield Cleanup Grant in the amount of \$200,000 to remediate asbestos-containing materials and other potential hazardous substances found in abandoned industrial structures at the J&L site in Clifton, New York. Remediation of hazardous materials through demolition of these dilapidated structures is critical to local revitalization efforts.

The CFEDC is pleased to participate on the team of local, regional and State stakeholders collaborating to see this site remediated and revitalized; it will continue to engage in this process by serving as a local leader in working towards the clean-up of the site, sharing information, assisting with community outreach and providing thoughtful input into revitalization discussions and activities.

As you know, the CFEDC, a grassroots community group, has been involved with efforts to encourage the clean-up and re-use of this site since 1998. We have attempted to partner with any local, county, state or federal agency or organization that could provide assistance and we have done everything possible to keep the clean-up and re-use of the site as a top agenda item for each of these agencies or organizations.

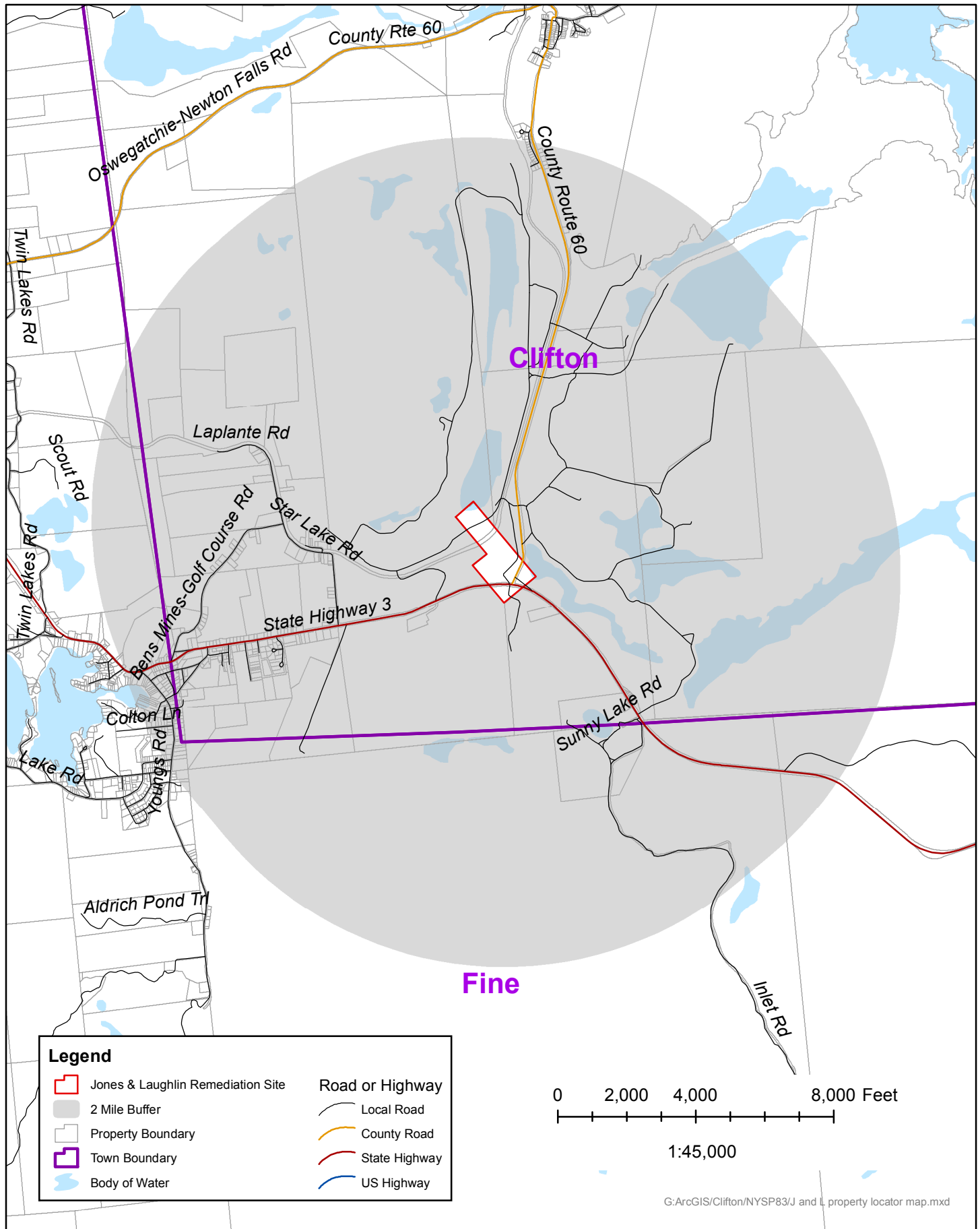
Please do not hesitate to contact me to discuss the CFEDC's role in this project and the potential impact that EPA funds will have on advancing this critical step in the revitalization of the former J&L site.

Sincerely,



Christopher L. Westbrook  
President

Jones & Laughlin Remediation Site, State Highway 3  
Town of Clifton, St. Lawrence County, New York



## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

12/22/2016

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

### State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

St. Lawrence County, New York

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

15-6000465

\* c. Organizational DUNS:

0758060420000

### d. Address:

\* Street1:

48 Court Street

Street2:

\* City:

Canton

County/Parish:

\* State:

NY: New York

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

13617-1169

### e. Organizational Unit:

Department Name:

Planning Office

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Keith

Middle Name:

\* Last Name:

Zimmerman

Suffix:

Title:

Planning Director

Organizational Affiliation:

St. Lawrence County Planning Office

\* Telephone Number:

315-379-2292

Fax Number:

315-379-2252

\* Email:

kzimmerman@stlawco.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-16-09

\* Title:

FY17 Guidelines for Brownfields Cleanup Grants

### 13. Competition Identification Number:

NONE

Title:

None

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

1238-J and L property locator map.pdf

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

St. Lawrence County seeks funds to abate hazardous materials in structures located at the former Jones & Laughlin (J&L) Steel Site (EPA Identification Number A23H) in the Town of Clifton, NY.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="780,000.00"/>
* d. Local	<input type="text" value="70,000.00"/>
* e. Other	<input type="text" value="550,000.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,600,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: